



General Services Administration  
Office of Government-wide Policy

# FY24 Governmentwide Section 508 Assessment

December 2024  
Government-wide  
IT Accessibility Program



# Table of Contents

<b>Message from the GSA Administrator</b> .....	<b>3</b>
<b>Executive Summary</b> .....	<b>5</b>
<b>Introduction</b> .....	<b>9</b>
<b>Background</b> .....	<b>13</b>
<b>Governmentwide Findings</b> .....	<b>15</b>
<b>Category-level Findings and Recommendations</b> .....	<b>67</b>
<b>Recommendations</b> .....	<b>85</b>
<b>Recent and Upcoming GSA Efforts to Improve Section 508 Compliance</b> .....	<b>88</b>
<b>Observations and Acknowledgments</b> .....	<b>98</b>
<b>Appendix A: Terms, Definitions, and Acronyms</b> .....	<b>A1</b>
<b>Appendix B: Methods</b> .....	<b>B1</b>
<b>Appendix C: Overview Data By Reporting Entity</b> .....	<b>C1</b>
<b>Appendix D: U.S. Department of Justice Addendum Submission to Congress and the President Concerning Federal Agencies' Compliance with Section 508 of the Rehabilitation Act Accessibility of Federal Electronic and Information Technology</b> .....	<b>D1</b>



# Message from the GSA Administrator

The General Services Administration (GSA), in consultation with the Office of Management and Budget (OMB), submits the Fiscal Year (FY) 2024 Governmentwide Section 508 Assessment—referred to hereafter as the “Assessment”—to the Senate Committees on Appropriations and Homeland Security and Governmental Affairs and the House Committees on Appropriations and Oversight and Accountability, pursuant to the requirements in [Public Law No. 117-328](#) (codified at [29 U.S.C. § 794d-1](#)). GSA understands that the Department of Justice (DOJ) plans to submit the FY24 Assessment in fulfillment of the requirement that the DOJ report every two years on the state of federal agencies’ compliance with Section 508 under 29 U.S.C. § 794d(d)(2) as noted in Appendix D. The DOJ worked with GSA to ensure that the FY24 Assessment included questions and analysis necessary for the Department’s biennial Section 508 report.

Beginning the second year of this initiative, GSA, OMB, and the U.S. Access Board (Access Board) built on the progress made in the [FY23 Assessment](#), along with the new guidance issued by OMB in the [Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act \(M-24-08\)](#) memo, to further advance governmentwide Section 508 compliance. The inaugural Assessment provided a necessary baseline for understanding federal agencies’ accessibility of digital content and compliance with Section 508 of the Rehabilitation Act, aimed at ensuring accessible Information and Communication Technology (ICT) for people with disabilities (PWD). This year, our analysis has expanded to include year-over-year highlights.

Assessment criteria – developed by OMB in consultation with GSA, the Access Board, Department of Justice (DOJ), and Office of Science and Technology Policy (OSTP) – remain the cornerstone of our evaluation. OMB and GSA collected data from 245 reporting entities based on 103 assessment criteria. This approach ensures a broad and deep understanding of Section 508 compliance and accessibility across the federal landscape of digital content.

The Assessment gathered valuable insights about the ongoing efforts and improvements across federal agencies. These developments were largely fueled by the FY23 Assessment results, which guided agency actions for the next assessment cycle. The resulting insights highlight successes and point to areas that need further improvement. GSA designed the recommendations to foster continuous improvement and drive meaningful progress with respect to digital accessibility.

Improving digital accessibility in government is essential not only to meet legal obligations but also to further the inclusion of people with disabilities in activities of daily living. In 2023, 22.5% of people with disabilities were employed, and the unemployment rate for people with a disability was 7.2% vs. 3.5% for people with no disability, according to

the [Bureau of Labor Statistics \(BLS\)](#). By ensuring all individuals can access vital services, agencies help remove barriers that contribute to the employment gap, among other barriers, fostering greater opportunities for people with disabilities to achieve economic independence and success.

GSA extends its continued gratitude to all reporting entities for their ongoing commitment to improve digital accessibility, respond to this robust data call, and transparency. Their efforts have been crucial in advancing our collective goal to increase Section 508 compliance and improve digital accessibility across the federal government. This Assessment strives to generate positive outcomes for federal employees and the American public.

If you have any questions about this report, please do not hesitate to contact GSA.

Respectfully submitted,



**Robin Carnahan**  
Administrator

# Executive Summary

Building on insights from the [FY23 assessment](#), the FY24 Governmentwide Section 508 Assessment (referred to as the “Assessment”) provides a deeper understanding of digital accessibility across the federal government. It evaluates the current state of Section 508 compliance and digital accessibility efforts, while also examining changes since the last reporting period. By introducing year-over-year (YOY) comparisons, this Assessment offers a more comprehensive view, enhancing transparency and accountability in federal digital accessibility efforts.

## Highlighted Findings

On average, governmentwide **maturity remained moderate but slightly improved** to 2.37 on a 5-point [maturity index](#), up from 2.17 in FY23. However, **conformance did not improve**, dropping YOY from 1.79 to 1.74 on the [conformance index](#), **remaining low**. More than 60% of respondents reported no change in conformance across their most-viewed ICT content. Insufficient staffing and resources remain barriers reported by respondents, limiting the ability to test, remediate, and enforce accessibility effectively. Other highlighted findings include:

- **Persistent Conformance Gaps:** About one-third or less of the reporting entities’ top-viewed ICT is fully conformant:
  - 23% of public internet pages
  - 20% of intranet pages
  - 25% of public documents
  - 34% of videos
- **Frequently Used ICT Remains Inaccessible:** Less than half of the reporting entities reported full conformance of ICT products commonly used by federal employees and the public, such as survey authoring tools and surveys, learning management systems, performance portals, video players, and chat or messaging systems. The ICT product with the highest percentage of full conformance to applicable standards was the entity’s publicly posted Section 508 policy at 42.4%. The product with the lowest percentage of full conformance to applicable standards was the employee performance portal with only 6.9% of entities reporting full conformance.
- **Limited Testing Capacity:** Approximately half of the reporting entities lacked resources to test their top-viewed ICT content. Additionally, 70% of respondents perform Section 508 conformance testing on their public internet web pages while only 41% of respondents perform Section 508 conformance testing on internal intranet websites as part of standard practice year round.
- **Maturity Improvements:** 27% of entities reported High maturity in FY24, up from 14% in FY23 – 6% reported Very High maturity in FY24, up from 4% in FY23.

- **Incremental Progress in Section 508 Program Staffing:** The percentage of reporting entities with a full-time Section 508 PM increased to 33%, up from 28% last year, and the average weekly hours dedicated to Section 508 activities rose to 17.9 – reflecting a 16.2% YOY increase. While 21% more entities now have a Section 508 PM than in FY23, 11% still have no Section 508 PM. Despite these gains, many programs continue to report lacking sufficient staffing to fully meet digital accessibility requirements.
- **Increased Investments in Training:** Training was the lowest dimension last year and remains the second lowest this year. However, entities noted substantial investments in training, resulting in a 31% improvement in average training maturity outcomes across government.
- **Prioritization of Digital Accessibility Needs Improvement:** Human Capital, Culture, and Leadership is the lowest dimension in FY24 and was the second lowest in FY23. Entities are making improvements including Section 508 compliance in leadership and management performance plans and integrating skills and competencies into relevant roles and responsibilities, which resulted in an improvement of about 18% in this dimension across the government. While improvements were reported, digital accessibility remains largely deprioritized across government.
- **Progress in Technology Lifecycle Activities and Section 508 Testing:** Overall, Section 508 testing and Section 508 integration into the technology lifecycle improved over the past year. The majority of reporting entities reported using a combination of automated and manual tools to test comprehensively. Entities are increasingly conducting testing on web content and integrating Section 508 reviews into electronic content prior to publication. However, inadequate or absent consideration of Section 508 at the early stages of the ICT lifecycle remains a significant challenge with 41% of respondents reporting that they sometimes or never integrate Section 508 conformance into technology lifecycle activities, or are unsure how often it occurs.
- **Procurement Issues Persist:** Though slightly improved from FY24, almost half of all respondents (46.6%) still accept contract deliverables without confirming they meet digital accessibility requirements.

The **positive correlation between maturity and conformance** identified in FY23 remains evident in FY24: **more mature programs** tend to report higher conformance. However, **systemic challenges persist** in staffing, testing, and procurement. As agencies continue to develop their programs, **training, leadership engagement, and vendor accountability** will be essential to achieving sustainable improvements in digital accessibility.

## Highlighted Recommendations

The recommendations resulting from the FY24 Governmentwide Section 508 Assessment build on those from the previous year. This year's recommendations place greater emphasis on improving

conformance itself and prioritizing testing, validation, and accountability at every stage of the ICT lifecycle. Furthermore, by strengthening leadership engagement and enhancing procurement practices, agencies can make measurable progress in digital accessibility compliance. Selected [recommendations](#) include:

- **Congress should consider updating Section 508 of the Rehabilitation Act (29 U.S.C. § 794d) and 29 U.S.C. § 794d-1 to include:**
  - **Definition of Agencies Subject to Section 508** to clearly define who should follow Section 508 standards and respond to this Assessment.
  - **Updated Language, Terminology, and Scope** to harmonize and strengthen the language for applicability to the current and future digital landscape.
- **Strengthen Enforcement of Section 508 Compliance:** Congress should explore options to strengthen enforcement of Section 508 compliance across the Federal government. As shown throughout this report, overall Section 508 compliance is low. Enforcement through internal audits, accountability mechanisms, among others, would lead to overall improved Section 508 compliance.
- **Require Section 508 as a Major Factor in Acquisition:** [As many respondents still do not consistently include Section 508 requirements in solicitations](#), **Chief Acquisition Officers, CIOs, and Heads of Agencies** should:
  - Develop and implement policies that integrate ICT accessibility into all ICT acquisition activities.
  - Include Section 508 conformance as a major or technical factor during the award or decision making process, as appropriate.
  - Reject contract deliverables unless they meet Section 508 requirements, as required by the contract.
- **Ensure Sufficient Section 508 Program Resourcing:** [Better resourced reporting entities tend to have better conformance outcomes](#) and [reporting entities noted that a lack of budget or funding was a major challenge](#). Since additional funding to aid Section 508 implementation was selected as a key factor for helping implement digital accessibility, **agency Chief Information Officers (CIO) or equivalent** should consider appropriately resourcing their Section 508 programs and ensure Section 508 program resourcing is explicitly included in budget requests.
- **Incorporate Section 508 Throughout the Technology Lifecycle:** Given that 63% of respondents [do not assess risk of Section 508 nonconformant ICT throughout the technology development lifecycle](#), **agencies** should incorporate digital accessibility considerations into relevant internal control processes to better ensure accessibility throughout the technology lifecycle.
- **Increase Conformance Validation Testing and Remediation:** The average conformance continues to be under 2.0 on a 5-point [conformance Index](#) scale and 50% or more respondents said [they did not have resources to test their ICT](#). Therefore, **agencies** should increase automated and manual Section 508 conformance testing, validation, and defect remediation

before deployment. Increased validation will likely create substantial positive downstream impacts as more conformant products and services are deployed.

- **Require Annual Section 508 Training by Roles and Responsibilities:** Although a significant improvement from last year, only about [34% of entities reported requiring any Section 508 training for employees](#). Additionally [37% of respondents have no Section 508 training plan defined](#). **Agencies** should require annual Section 508 training for all employees who create, maintain, or otherwise contribute to the agencies' digital content.

# Introduction

## Purpose

Now entering its second year, the purpose of this Assessment remains twofold:

1. To address the critical need for accessible information and communications technology (ICT) in the federal government, particularly recognizing its impact on persons with disabilities (PWD).
2. To improve transparency, accountability, and trust regarding Section 508 compliance, fulfilling specific reporting requirements under [29 U.S.C. § 794d-1](#).

## Addressing the Governmentwide Need for Accessible ICT

Building upon the foundational insights from the [inaugural assessment](#), the FY24 Governmentwide Section 508 Assessment expands and deepens the understanding of digital accessibility within the federal government. It captures reporting entity current compliance with Section 508 compliance and digital accessibility efforts, while also examining the change from the previous reporting period. This Assessment introduces year-over-year (YOY) changes, providing a more comprehensive evaluation of digital accessibility and continuing to enhance transparency, accountability, and trust in federal digital accessibility efforts.

## 29 U.S.C. § 794d-1 Reports on Accessibility of Electronic Information to Individuals with Disabilities

On December 29, 2022, Congress passed the Consolidated Appropriations Act 2023 Public Law No. 117-328, codifying the reporting requirement for this Assessment at [29 U.S.C. § 794d-1](#). This mandated new requirements for the Office of Management and Budget (OMB), the General Services Administration (GSA), and the U.S. Access Board (Access Board) to collect and report on federal agency data on ICT accessibility.

To meet the requirements of [29 U.S.C. § 794d-1\(a\)\(2\)\(B\)](#), this Assessment defines “[agency](#)” as any federal department, component-level, and independent agency subject to Section 508 of the Rehabilitation Act. Agency components, such as bureaus, sub-agencies, or major organizational divisions, as determined by the agency, reported independently from their “parent” agencies. Furthermore, “parent” agencies limited their reporting to their own operations, excluding input from component agencies. Assessment instructions stated parent agencies should coordinate with their components to enhance the accuracy and consistency of responses.

[M-24-08 Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act](#) provides guidance for agencies to enhance digital accessibility by ensuring ICT is accessible,



promoting inclusive digital experiences, and implementing accessibility standards as per Section 508, and it requires that “each agency shall report annually to OMB and [GSA] on its compliance with Section 508, in accordance with criteria and instructions disseminated by OMB.”

This Assessment uses the term “reporting entity” as the unit of data collection, which consists of:

- “Agencies,” which broadly applies to organizational components such as bureau, department level, or headquarters.
- “Components,” which broadly applies to an organizational unit typically one level below a department or large agency enterprise level.

The makeup of all 245 reporting entities consists of:

- [24 Chief Financial Officers \(CFO\) Act Agencies](#), comprised of:
  - 24 “parent” agencies
  - 11 of those parent agencies have a total of 158 components
- 63 Small and Independent Agencies or Entities (e.g., Commissions, Councils, Corporations)

**Please note that the terms “reporting entity” and “respondent” used in this Assessment are not synonymous with “agencies” as used in Section 508 of the Rehabilitation Act or M-24-08. Thus, not all respondents may be subject to Section 508 implementation requirements or to M-24-08 guidance.**

OMB, in close coordination with GSA, the Access Board, the Office of Science and Technology Policy (OSTP), and the Department of Justice (DOJ), refined the assessment criteria from the previous year, incorporating feedback from agencies to thoroughly and efficiently evaluate reporting entity Section 508 compliance. For a complete list of changes, please reference the [crosswalk between FY23 and FY24 criteria](#). GSA also refined additional context for understanding the criteria, Frequently Asked Questions (FAQs), and defining terms to help reporting entities collect accurate data for the Assessment.

OMB broadly distributed instructions and 103 assessment criteria to heads of agencies, agency Chief Information Officers (CIO), and Section 508 Program Managers (PM) on April 8, 2024. Additionally, GSA posted the instructions and [criteria](#) on [Section508.gov](#) the same day.

OMB deferred to departments and agencies to define how they would report: individually, by organizational unit or “reporting entity,” or as a component of a larger parent agency. Reporting entities then designated a point of contact for the Assessment. GSA referenced and maintained, at the direction of OMB, a list of reporting entities and information for each point of contact.



GSA then created and released an online data submission tool for each designated point of contact to submit Assessment responses. In the leadup to the July 31, 2024, the deadline for data submissions, GSA held 11 open office sessions to answer questions about the Assessment and three submission tool demo sessions to review best practices for using and navigating the submission form.

## Structure

This Assessment report is organized into four main sections:

1. [Background](#) summarizes recent developments in federal law and policy related to the advancement of digital accessibility and Section 508 compliance.
2. [Governmentwide Findings](#) and [Category-level Findings and Recommendations](#) highlight governmentwide and reporting entity-specific trends found in the submitted data using methods described in Appendix B.
3. [Recommendations](#) propose ways to improve Section 508 and digital accessibility compliance that are based on statistical analysis of reporting entity data and contextual knowledge.
4. Appendices provide a detailed explanation of terms and acronyms, analytical methods, and comprehensive responses by reporting entities.

## GSA's Reporting Requirement

As part of [29 U.S.C. § 794d-1\(b\)](#), GSA has a statutory requirement to provide an annual comprehensive assessment of Section 508 compliance across the federal government.

### **Paragraph b:**

(1) Not later than 1 year after the date of enactment of this Act, and annually thereafter, the Administrator, in consultation with the Director, shall prepare and submit to the Committees on Appropriations and Homeland Security and Governmental Affairs of the Senate and the Committees on Appropriations and Oversight and Reform of the House of Representatives a report that shall include—

- (A) a comprehensive assessment (including information identifying the metrics and data used) of compliance by each agency, and by the Federal Government generally, with the criteria and instructions disseminated under subsection (a)(1);
- (B) a detailed description of the actions, activities, and other efforts made by the Administrator over the year preceding submission to support such compliance at agencies and any planned efforts in the coming year to improve compliance at agencies; and
- (C) a list of recommendations that agencies or Congress may take to help support that compliance.

(2) The Administrator shall ensure that the reports required under this subsection are made available on a public website and are maintained as an open Government data asset (as that term is defined in section 3502 of title 44, United States Code).

### **GSA Reporting Efforts:**

- To meet the requirements of (b)(1)(A), the Assessment evaluates and summarizes governmentwide Section 508 and digital accessibility compliance in [Governmentwide Findings](#) and [Category-level Findings and Recommendations](#), according to the 103 Assessment criteria. Furthermore, Appendix C provides a one page summary of digital accessibility data for each reporting entity.
- To meet the requirements of (b)(1)(B), the Assessment describes GSA's efforts to help reporting entities collect and submit their assessment data, as well as related endeavors to improve digital accessibility processes, in [Recent and Upcoming GSA Efforts to Improve Section 508 Compliance](#).
- To meet the requirements in (b)(1)(C), in [Recommendations](#), the Assessment proposes how Congress and agencies may improve governmentwide Section 508 programs and digital accessibility.
- To meet the requirements of (b)(2), data is publicly available on [Section508.gov/2024-congressional-report](#), including respondent data as an ["open government data asset."](#)

# Background

Please refer to [Section508.gov](https://www.section508.gov)'s [IT Accessibility Laws and Policy](#) for review of key legislative and executive actions that have advanced digital equity across the federal government over the past 50 years. Please refer to the [FY23 Assessment](#) for a review of federal initiatives and resources on ICT accessibility.

## Recent Federal Law and Policy on ICT Accessibility

Since the publication of the FY23 Assessment in December 2023, the federal government continues to issue important law and policy to improve digital accessibility, most notably:

- [M-24-08 Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act](#) provides implementation guidance to federal agencies for establishing digital accessibility programs and policies, procure accessible products and services, design and develop accessible digital experiences, and create accessible content. The memo also provided strategies to manage feedback, remediate accessibility issues, and cultivate a culture of digital accessibility. **Immediate agency actions** included appointing Section 508 program managers, updating digital accessibility statements, establishing feedback mechanisms, and assessing ICT accessibility policies. In addition to agency-specific actions, the memo required the following [governmentwide actions](#): updating resources on [Section508.gov](#), standardizing accessibility conformance reporting, expanding digital accessibility certifications and training, accommodating assistive technology, establishing a governmentwide service to help agencies acquire products and services related to the accessibility of ICT, and exploring a federal digital accessibility design and testing lab.



### **M-24-08 covers the following pillars of building and sustaining accessible federal technology:**

- Establish Digital Accessibility Programs and Policies
- Buy Accessible Products and Services
- Design and Develop Accessible Digital Experiences
- Create, Communicate, and Deliver Accessible Content
- Evaluate, Monitor, Collect Feedback, and Remediate for Accessibility
- Cultivate a Positive Culture of Digital Accessibility

- The DOJ published [Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities](#), a final rule updating regulations for [Title II](#) of the [Americans with Disabilities Act of 1990 \(ADA\)](#), as amended. This rule sets forth WCAG 2.1 Level AA as the technical standard for web content and mobile application accessibility for services, programs, and activities provided by state and local governments.
- The Department of Health and Human Services (HHS) finalized [Discrimination on the Basis of Disability in Health and Human Service Programs or Activities](#), a rule that prohibits discrimination on the basis of a disability and includes a definition of what accessibility means for websites, kiosks, and mobile applications at HHS. It also requires compliance with WCAG 2.1 AA, aligning with the standards published by the DOJ under Title II of the Americans with Disabilities Act.

# Governmentwide Findings

## Summary

In the second year of the Assessment and 26 years since the Rehabilitation Act of 1973 was amended to include Section 508, **governmentwide Section 508 conformance remains low and without improvement in FY24**. There remains significant variation in conformance across government, with some respondents reporting full conformance of ICT, while others report little to no conformance. Although we have not yet observed a governmentwide improvement in ICT conformance, the **data indicates there have been investments in Section 508 programs over the past year** with some entities noting this was spurred by the FY23 Assessment or OMB's M-24-08. Entities acknowledged gaps that were apparent in the FY23 Assessment and reported using the Assessment and M-24-08 as a roadmap for improvement. More conformant ICT governmentwide will result as agencies:

- Continued investments in a Section 508 program.
- Develop sufficient digital accessibility policies, processes and procedures.
- Define roles and responsibilities for accountability of digital accessibility.

The FY24 Assessment expanded the breadth and depth of reporting entities this year to include 15 new respondents. The following findings are based on self-reported data from 245 reporting entities related to information and activities between June 1, 2023, and May 31, 2024.<sup>1</sup> Similar to last year, there was no independent data verification or testing to assess the accuracy of entity submissions.

Please see the Methods section for a comprehensive explanation of data validation flags and calculations used to ascertain each reporting entity's maturity and conformance. The Observations and Acknowledgments section addresses misunderstandings of terminology, discrepancies in results, and issues flagged during data validation. Not all criteria were statistically significant for this analysis, thus the [Findings](#) section does not summarize every data point.<sup>2</sup> However, all response data can be accessed publicly in [Assessment Data and Downloads](#).

---

<sup>1</sup> Reporting entity denotes a respondent to the Assessment. This report uses the term "reporting entity" rather than "agency" or "component" as traditionally defined because reporting entity Section 508 programs may be organized or function outside of these traditional definitions. Fifteen submissions were from entities that did not submit data in FY23, while 13 entities restructured how they submitted as a reporting entity and thus did not have a submission for FY24. Six other entities who submitted in FY23 did not submit data in FY24 for unknown reasons. Please see Observations for additional details.

<sup>2</sup> To determine statistical significance of YOY comparisons, GSA used the Wilcoxon Signed-Rank Test (WSRT) for non-normal data and used the paired t-test (PTT) for the rare cases of normally distributed paired samples. In both tests, probability values (p-values) help determine whether the observed differences are likely due to chance. Asterisks indicate the level of statistical significance and provide a quick reference to the strength of YOY findings across the report. For further details, refer to Pre-Post Analysis in the Methods section.

The following sections assess conformance outcomes and maturity inputs to comprehensively evaluate governmentwide Section 508 compliance, identify continued opportunities for improvement, and gain a clearer understanding of where deficiencies still exist in digital accessibility efforts and their causes. **On average, governmentwide maturity slightly improved but remains moderate** at 2.37 on a 5-point scale compared to 2.17 in FY23. **On average, governmentwide conformance did not improve and remains low** at 1.74 on a 5-point scale (compared to 1.79 in FY23). Results, analysis, and specific figures for these outcomes are shown below.

Overall, across the federal government, the average digital accessibility conformance of ICT did not improve while the maturity of digital accessibility-related efforts improved slightly from FY23 to FY24.

## Governmentwide Conformance at a Glance

What Improved:

**Top Viewed ICT Results:** Slightly more reporting entities submitted results this year for top viewed internet web pages, electronic documents, and videos and the percentage of conformance of those top viewed ICT slightly improved.

Figure 1: C-Index Change YOY

What Declined:

### Overall Conformance of the Federal Government:

The average governmentwide conformance score fell slightly from 1.79 in FY23 to 1.74, indicating a decrease in compliance across public facing and internal ICT.



**C-Index Change YOY**  
Conformance  
from 1.79 down to 1.74



**Testing Coverage:** Fewer respondents conducted web testing as part of regular business functions, with only 70% assessing public internet websites (down from 78%), covering 41% of total public pages versus 52% previously. Intranet web page testing also declined, with only 41% of entities testing 8% of total intranet pages, down from 26% of total intranet pages last year.

**Intranet Conformance Declined:** While conformance rates for public web pages held steady around 62%, intranet conformance declined from 59% to 52%. Top viewed intranet web page conformance also declined, from 25% of pages reported as fully conformant in FY23 to 20% reported in FY24.

Potential Drivers:

**Insufficient Testing Resources:** Many entities continue to report insufficient resources to test top viewed or widely used ICT, resulting in limited to no insight into the accessibility of their ICT inventory.

**Shift in Testing Focus:** As entities rely more on automated testing, comprehensive manual checks – which are necessary for assessing full conformance – have likely been deprioritized, affecting overall accessibility insights. Reporting entities may not have staff who are fully trained or capable of conducting manual testing across all applicable Section 508 standards.

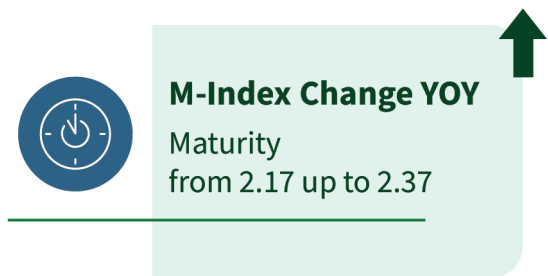
## Governmentwide Maturity at a Glance

What Improved:

**Governmentwide Maturity:** Average maturity increased from 2.17 to 2.37, leading to a 9% YOY increase.

**Maturity Dimensions:** IT Accessibility Program Office; Communications; Content Creation; Human Capital, Culture, and Leadership; Testing and Validation; Acquisition and Procurement; and Training all increased. Training had the highest YOY increase at 31%, with a shift from 1.57 out of five in FY23 to 2.06 in FY24.

Figure 2: M-index Change YOY



What Declined:

**Maturity Dimensions:** Policies, Procedures, and Practices and Technology Lifecycle Activities both declined slightly with a decrease of 7% YOY.

Potential Drivers:

**Increased Investment:** Increase in maturity likely reflects increased investment in Section 508 program activities, including creating policies, requiring regular accessibility training, creating accessibility statements and establishing feedback mechanisms. Numerous questions saw improvement as reporting entities developed and refined their accessibility capabilities.

**Additional Resources and Time:** The number of program managers and the amount of time spent on digital accessibility and the Section 508 program both increased. This may have allowed reporting entities to allocate more time to program development, resulting in better maturity outcomes.

## Compliance Key Findings

Overall, reporting entities experienced a decline in Section 508 conformance, with the governmentwide average score dropping from 1.79 in FY23 to 1.74. Amid this broader decline, testing coverage also decreased, with only 70% (down from 78%) of respondents assessing public web pages covering 41% (down from 52%) of total pages. Intranet testing dropped further, with only 41% of entities evaluating 8% of total intranet web pages, a precipitous reduction from 26.1% of total in FY23. While conformance rates for public web pages held steady around 62%, intranet conformance declined from 59% to 52%. Additionally, nearly half of respondents lacked resources for testing high-traffic ICT assets, including top-viewed web pages, documents, and videos. These findings underscore the need for improved testing resource allocation, including testing tools and testing personnel, and prioritization of testing and remediation efforts to drive meaningful improvements in conformance.

To determine the level of Section 508 conformance of ICT, the Assessment asked about conformance of internal and public-facing web pages, top-viewed electronic documents and videos. The Assessment also asked about levels of Section 508 conformance of common digital products, including:

- Conference or workstation reservation systems
- Survey authoring tools and distributed surveys
- Chat or messaging systems
- Learning Management Systems (LMS)
- Publicly-posted Section 508 or digital accessibility policies
- Video players
- Widely used public-facing fillable forms
- FY25 Congressional Justifications (CJ)
- Employee performance portals or equivalent

---

The Assessment combined these measures to create a conformance index referred to as “conformance” or “c-index.” **On average, governmentwide conformance did not improve and remains low** at 1.74 on a 5-point scale compared to 1.79 in FY23.

---

The Assessment continued to ask entities to report on the outcomes of accessibility testing of web pages evaluated as part of standard business functions throughout the reporting period for both **public internet** web pages and **internal intranet** web pages. Questions covered how many of each the respondent owned and operated, how many were tested for Section 508 conformance, how many web pages fully conformed, average number of defects found, and details on testing methodologies



used. While there is much variance in entities who reported both years and the scope of this testing, FY24 data showed:

- Only 70% or 172 respondents reported they performed testing for Section 508 conformance on **public internet** websites they owned or operated compared to 78% of entities who performed testing last year. Reportedly, 6,964,802 internet web pages were tested, totalling 41% of all internet pages owned or operated by reporting entities, which is down from 52% of all internet pages owned or operated by reporting entities in FY23.<sup>3</sup>
- On average, 62% of tested internet pages were reported as fully conformant, which is almost the same as FY23 at 61%.<sup>4</sup>
- **Even fewer entities reported testing internal intranet pages.** Approximately 41% or 100 respondents reported they performed testing for Section 508 conformance on **internal intranet** websites they owned or operated, down from 60% in FY23. Reportedly, 218,663 intranet web pages were tested, totaling just 8% of all intranet pages owned and operated by reporting entities, a substantial decrease from FY23's 26.1% of pages tested.<sup>5</sup>
- On average, 52% of tested intranet pages were reported as fully Section 508 conformant, a decrease from 59% in FY23.<sup>6</sup>

While current data does not provide reasons why the total number of web pages tested decreased YOY, some speculative reasons include:

- An overreporting in FY23.
- A more accurate reporting in FY24.
- An underreporting in FY24.
- A misunderstanding of questions leading to inaccurate reporting of data.
- A change in testing methodology.
- Testing less ICT.

<sup>3</sup> A total of 16,840,036 public internet pages were reported as owned or operated by reporting entities.

<sup>4</sup> One hundred thirty-three (133) entities reported data for Q69a related to specific percentages of fully conformant pages, which is less than the overall number of entities who reported testing public internet pages in Q68a. It is unclear why.

<sup>5</sup> A total of 2,716,520 internal intranet pages were reported as owned or operated by reporting entities.

<sup>6</sup> Eighty-one (81) entities provided data for Q74a related to specific percentages of fully conformant pages, which is less than the 100 entities who reported testing internal intranet pages in Q73a.

\* It is not possible to know if the same web pages were tested YOY due to different naming conventions, changing URLs, and lack of sufficient data in some cases. Some variance in the conformance could be due to testing different pages.



Of the 117 entities who reported data both years regarding testing of **public internet** websites, 46 reported improved conformance YOY, 45 reported a decrease in conformance YOY, and 26 reported the same level of conformance with 10 maintaining 100% conformance, 5 maintaining 0% conformance and 11 maintaining their conformance ranging between 40% and 99%.\*

The low numbers reported do not align with M-24-08 guidance nor FY23 Assessment recommendations to increase conformance validation and testing. Future assessment criteria and respondent follow-up will help shed light on changes in testing depth and breadth YOY to better understand swings in reported data.

Respondents denoted what percentage of web pages were evaluated through automated and manual testing, automated testing only, and manual testing only. The data from these questions was insightful despite a number of data validation failures.<sup>7</sup>

Responses for public web pages tested showed entities predominantly relied on only automated testing. This may suggest that while entities are testing, they are not testing for all applicable Section 508 standards, as automated tools alone cannot test for everything. Similar to findings last year, with reliance on solely automated testing for **public web pages**, there continues to be a risk of conformance inflation since automated tools cannot comprehensively test for all Section 508 standards.

Entities reported predominantly using hybrid or manual test processes for **internal intranet web pages**, with little reliance on only automated testing tools. This may be due to security and access limitations of automated tools on intranet content and technologies. Additionally, fewer web pages were tested and fewer pages were found to be fully conformant this year. Both speculative reasons and data provided by reporting entities for why this may be include:

- Intranet pages require more manual testing and limited resources cannot provide comprehensive testing.
- The technology stack or framework used for intranet has accessibility defects, resulting in 0% conformance of every page.
- Templates used across the intranet are not fully accessible; even one defect may be perpetuated across every page resulting in 0% conformance.
- Lack of attention or prioritization of intranet content compared to public-facing ICT.



Of the 60 entities who reported data both years regarding testing of internal intranet websites, 20 reported improved conformance YOY, 22 reported a decrease in conformance YOY, and 18 reported the same level of conformance with 5 maintaining 100% conformance, 6 maintaining 0% conformance, and 7 maintaining their conformance ranging between 14% and 93%.\*

<sup>7</sup> There were 40 data validation failures for incorrect numbers for the sum of Q68b, Q68c, and Q68d and 23 for the sum of Q73b, Q73c, and Q73d. A number of entities submitted sums of responses b-d that exceeded 100%.

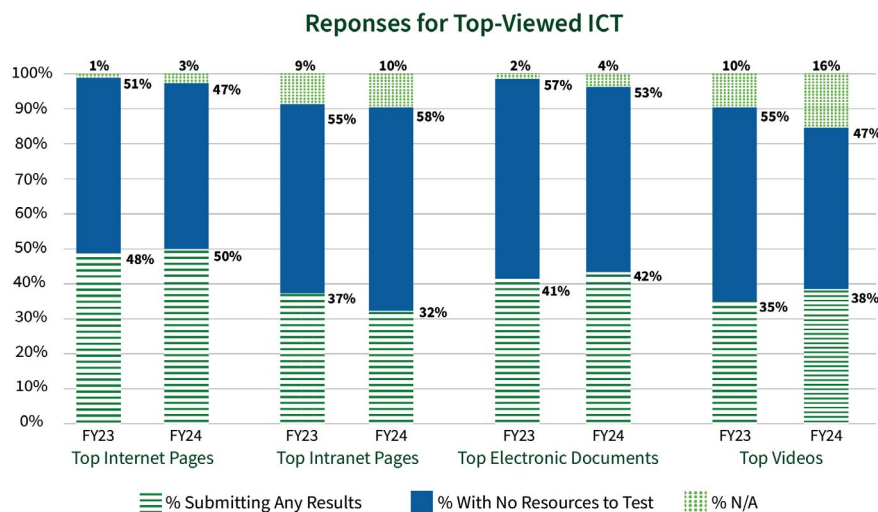
\*It is not possible to know if the same web pages were tested YOY due to different naming conventions, changing URLs, and lack of sufficient data in some cases. Some variance in the conformance could be due to testing different pages.

Entities reported an average of 7.5 defects per internet web page tested during the reporting period.<sup>8</sup> The average number of defects found on internal intranet pages was slightly less at 6.2 defects per page.

## Compliance of Top Viewed ICT

The Assessment continued to ask entities to test their top 10 viewed internet web pages, intranet web pages, and electronic documents and top five viewed videos. As Figure 3 shows, **on average, about half of respondents reported they did not have resources to test any of their top viewed ICT, which remains a high number.** With the exception of intranet web pages, slightly more entities submitted results this year for top viewed pieces of ICT and the percentage of conformance of the top viewed ICT slightly improved. **However, it is apparent in submitted data that entities do not have, or are not prioritizing, available resources to test ICT they procure, develop, maintain or use.**

**Figure 3: YOY Comparison of percentages of respondents submitting conformance testing results for the top intranet and internet web pages, electronic documents, and videos (Q71, Q76-78)**



Analysis of YOY change shows a continued variation of responses. 4% more entities submitted test results for the top viewed internet pages but 14% fewer entities provided results for top viewed intranet web pages. Additionally, in FY24 both electronic documents and videos saw a small percentage increase in entities who submitted results. Data shows the largest swing in entities who selected Not Applicable in FY24, with:

- 7 entities reporting no public facing internet web pages compared to 3 in FY23.<sup>9</sup>
- 25 entities reporting no intranet pages compared to 22 in FY23.

<sup>8</sup> One entity reported an average of 25,950 defects per web page, leading to an average of 195 defects per page. Due to a significant data skew, we excluded this number from the analysis above.

<sup>9</sup> Upon review, all seven respondents have a home page, at minimum, for their reporting entity. Follow up with entities who selected they have no public facing web pages, documents, or videos is needed to better understand the increase of responses.

- 11 entities reporting no public facing electronic documents compared to 5 in FY23.
- 39 entities reporting no videos compared to 24 in FY23.

Table 1 shows the total YOY change between the percentages of responses for entities who submitted any results, who noted they had no resources to test, or did not have the ICT in question.

**Table 1: YOY change between the percentages of responses for entities who submitted any results, who noted they had no resources to test, or did not have the ICT in question.**

Type of Change	Top Viewed Internet	Top Viewed Intranet	Top Viewed Electronic Documents	Top Viewed Videos
<b>FY24 % Change of Entities Submitting Any Results</b>	3.4% <b>more</b> entities submitted responses	14.3% <b>fewer</b> entities submitted responses	2% <b>more</b> entities submitted responses	11.3% <b>more</b> entities submitted responses
<b>FY24 % Change of Entities With No Resources To Test</b>	9.4% <b>fewer</b> entities reported no resources to test	4.4% <b>more</b> entities reported no resources to test	8.4% <b>fewer</b> entities reported no resources to test	16.8% <b>fewer</b> entities reported no resources to test
<b>FY24 % Change of Entities who selected N/A</b>	133% <b>more</b> entities selected N/A <sup>10</sup>	13.6% <b>more</b> entities selected N/A	120% <b>more</b> entities selected N/A <sup>11</sup>	62.5% <b>more</b> entities selected N/A

As shown in Figure 4, **there was a slight YOY increase in the percentage of top viewed ICT that fully conforms with internet page conformance increasing by 1.3%, top documents increasing by 1.7%, and top videos increasing by 4.5%. However, there was a decrease by 4.5% in conformance YOY for top viewed intranet**, which is further supported by an indication of a moderate, meaningful increase (WRST: extremely statistically significant) in the conformance failure rate YOY.<sup>12</sup>

**The governmentwide Section 508 compliance for the top viewed ICT remains Low, with approximately less than one-third of all top-viewed ICT reporting as fully conformant:**

- 23% of top viewed publicly available internet web pages fully conforming to Section 508 standards.
- 20% of the top viewed internal intranet web pages fully conforming to Section 508 standards.

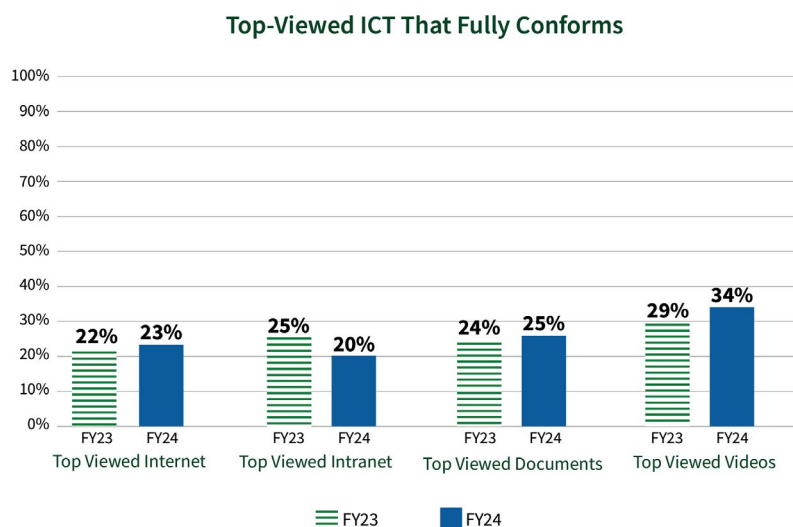
<sup>10</sup> Seven entities selected this in FY24 compared to three in FY23.

<sup>11</sup> 11 entities selected this in FY24 compared to five in FY23.

<sup>12</sup> For an explanation of “(WRST)”, please see Pre/Post Analysis in Methods.

- 25% of the top ten viewed electronic documents posted publicly fully conforming to Section 508 standards.
- 34% of the top five viewed videos fully conforming to Section 508 standards.

**Figure 4: YOY comparison of percentage of fully conformant ICT for all top intranet web pages, internet web pages, electronic documents, and videos tested (Q71 to Q76-78)**



Data for the top viewed ICT across reporting entities points to a trend of stagnation in accessibility efforts rather than significant progress or regression in the most viewed types of ICT. **Despite targeted initiatives and detailed guidance, the majority of reporting entities are maintaining the same level of conformance YOY, with more than 60% showing no movement across all most viewed content types.** The breakdown by ICT type is further detailed in Top Viewed Intranet and Internet Web Pages and Top Viewed Electronic Documents and Videos below.

## Top Viewed Intranet and Internet Web Pages

Two-hundred and thirty (230) reporting entities provided two years of data to analyze. More than half of the entities (61% or 141) reported no change YOY in their compliance of top viewed public internet pages and even more entities (72% or 165) reported no change in compliance of their intranet pages. A full breakdown of the entity counts with YOY top viewed web page changes can be found in Table 2.

---

22% of entities reported more conformant top viewed internet pages in FY24 but only 12% of entities reported more conformant top viewed intranet web pages in FY24.

---

Several factors contribute to the types of changes:

- Some increases in compliance are a result of testing content this year.

- Some decreases in compliance are a result of not testing content this year whereas they reported test results last year.
- Some of the top viewed pages are not the same as last year.<sup>13</sup>
- Some entities fixed part or all of the content that was not fully conformant last year and that web page remained in the top viewed in FY24.
- Lack of change YOY may be due to either a lack of resources to test content both years or conformance level was the same both years. It may not be an overall indication of ICT conformance.

#### **For reporting entities with no YOY change for public internet web pages:**

- 2 entities noted they did not have public internet web pages both years.<sup>14</sup>
- 14 entities remained at 100% conformance for internet web pages.
- 4 entities maintained the same level of compliance (between 10% - 40%).
- 121 entities reported no change due to either a lack of resources to test content both years or 0% conformance of pages tested both years.

#### **For reporting entities with no YOY change for internal intranet web pages:**

- 14 entities noted they did not have internal intranet web pages both years.
- 1 entity remained unchanged at 70% conformance.
- 6 entities remained at 100% conformance for intranet web pages.
- 144 entities reported no change due to either a lack of resources to test content both years or 0% conformance of pages tested both years.

**Table 2: YOY Conformance Change of Top Viewed Web Pages**

Type of Change	FY23 to FY24 Public Internet Entity Count	FY23 to FY24 Internal Intranet Entity Count
<b>No Change YOY</b>	141	165
<b>More Conformant YOY</b>	50	27
<b>Less Conformant YOY</b>	39	38

Of all reporting entities, only 123 (or 50%) of respondents provided results for the top 10 viewed public internet web pages. 115 entities (or 47%) reported not having resources to test and 7 entities

<sup>13</sup> Inconsistent data, including missing URLs, incomplete URLs, and mismatches between page names and descriptions, prevented a one-to-one comparison of web pages from last year to this year. For future assessments, we aim to evaluate YOY conformance trends at the level of specific URLs.

<sup>14</sup> Both entities have a public-facing website; it is unclear why they selected Not Applicable.

reported Not Applicable because they do not have public internet web pages.<sup>15</sup> **Overall, entities reported on conformance of 1,161 top viewed public internet web pages in FY24 compared to 1,129 in FY23.**

Fewer reporting entities provided results for top 10 viewed internal intranet web pages, with only 78 entities, or 32% of respondents providing data. Many more entities, 142 or 58%, reported no resources to test their most viewed intranet pages, with 25 entities reporting not having an intranet. **Overall, in FY24, 712 intranet web pages were tested compared to 824 in FY23.**

Several possible reasons for a decrease in the number of entities who tested intranet web pages include:

- Lack of prioritization of intranet testing.
- Intranet testing is more time consuming.
- Lack of staff or capabilities to perform comprehensive testing.
- Challenges related to identifying the top viewed intranet pages.

## Top Viewed Electronic Documents and Videos

Less than half of all reporting entities (42%) provided results for the top viewed electronic documents. Over half of all reporting entities (53% or 131 respondents) reported no resources to test the top viewed electronic document, while 11 entities selected that they do not post any electronic documents. **In total, 945 top viewed electronic documents were tested in FY24, compared to 905 in FY23.**

Ninety-two (92) entities (38%) provided data for their top viewed videos. 114 entities (47%) noted they did not have resources to test and 39 entities reported that they do not produce or host videos. **In total, 435 top viewed videos were tested in FY24, compared to 407 in FY23.**

Of the 230 entities that have two years of data to analyze, 144 entities (60%) reported no change YOY in compliance of their top viewed electronic documents with 156 entities (68%) reporting no change YOY in compliance of their most viewed videos. **19% of entities**



### Top five defects found in internet and intranet web page in FY24 (same as last year):

- 1.1.1 Non-text Content
- 1.3.1 Info and Relationships
- 1.4.3 Contrast (Minimum)
- 2.4.4 Link Purpose (in Context)
- 4.1.2 Name, Role, Value

<sup>15</sup> As mentioned above, all seven respondents have a home page, at minimum, for their reporting entity.



**reported less conformant electronic document outcomes YOY whereas 16% of entities reported less conformant videos YOY.** A full breakdown of the entity counts with YOY top viewed electronic documents and videos changes can be found in Table 3. As noted in web page testing above, similar factors contribute to these trends.

**For entities with no YOY change for electronic documents:**

- 2 entities reported that they did not have electronic documents in either year.
- 15 entities remained at 100% conformance for electronic documents.
- 2 entities maintained the same level of compliance (between 20% - 60%).
- 125 entities reported no change due to either a lack of resources to test content both years or 0% conformance of documents tested both years.

**For entities with no YOY change for videos:**

- 16 entities noted they did not have videos in either year.
- 23 entities remained at 100% conformance for videos.
- 117 entities reported no change due to either a lack of resources to test content both years or 0% conformance of videos tested both years.

**Table 3: Trend YOY of Top Viewed Electronic Documents and Videos**

Type of Change	FY23 to FY24 Electronic Document Entity Count	FY23 to FY24 Video Entity Count
No Change YOY	144	156
More Conformant YOY	43	38
Less Conformant YOY	43	36

The data for top viewed ICT indicate that reporting entities are essentially treading water in their accessibility efforts. Furthermore, the counts for increased and decreased conformance between FY23



**For the top electronic documents tested, the top five defects found were the same as FY23:**

- 1.1.1 Non-text Content
- 1.3.1 Info and Relationships
- 1.3.2 Meaningful Sequence
- 2.4.2 Page Titled
- 2.4.6 Headings and Labels

**For videos, the top defect noted was still WCAG 1.2.5: Audio Description (prerecorded).**



and FY24 are relatively balanced, which suggests that respondents that did make changes largely offset respondents that declined. This balance shows that improvements in some areas are being offset by declines in others, reinforcing an overall pattern of stagnation.

## Compliance of Widely Used ICT

To expand the scope and breadth of ICT products, the Assessment asked about ten specific ICT products used internally by employees and the public. The list of products asked about in FY24 differs from FY23.<sup>16</sup> These new questions asked entities to estimate conformance levels of the following enterprise-wide products:

- Conference or workstation reservation systems
- Survey authoring tool
- Surveys distributed by the reporting entity
- Chat or real-time messaging system
- Learning management systems
- Publicly posted Section 508 or digital accessibility policy
- Video player
- Most widely-used public facing fillable form
- Publicly posted FY 25 Congressional Justifications
- Employee performance portals or equivalent

In addition to new ICT, the response options also offered more granularity in how conformant each ICT was. Instead of asking a yes or no question regarding full conformance, the response options asked entities to calculate the percentage of conformance and select between three ranges or select 100% conformant.

While 100% conformance is the Section 508 standard, few entities reported full conformance of their ICT products. As Figure 5 depicts, the ICT product with the highest percentage of full conformance to applicable standards was the entity's publicly posted Section 508 policy at 42.4% followed by enterprise-wide chat or real-time messaging system at 32.7%. **The ICT product with the lowest percentage of full conformance to applicable standards was the employee performance portal with only 6.9% of entities reporting 100% conformance.** This may deeply impact federal employee's abilities to independently access and use their performance portal to complete required job performance documentation.

---

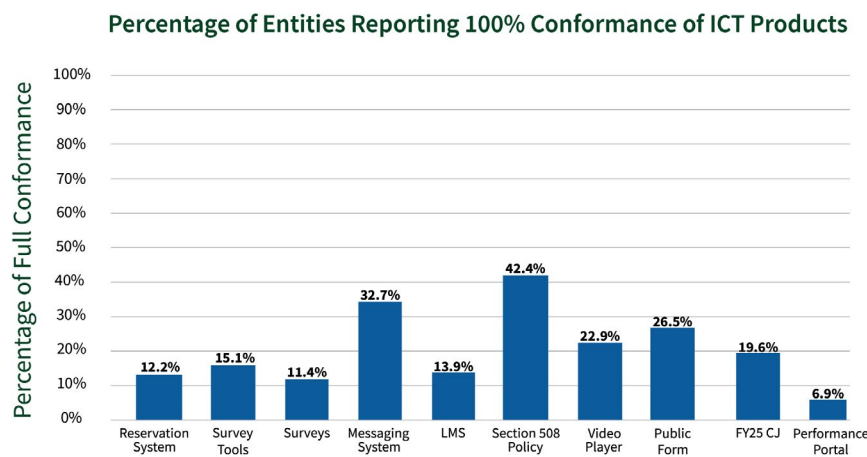
<sup>16</sup> Ten new criteria were introduced in FY24 (Q80 to Q89) to increase the types of ICT asked about on a rotating basis, meaning that every two years, these criteria will be included in the Assessment. Thus, the 10 ICT questions from FY23 will not be comparable to these new ICT in FY24.

The introduction of ten new questions, replacing those from FY23, has provided valuable insights into how different components of the c-index influence the overall assessment of accessibility performance.<sup>17</sup> In both FY23 and FY24, the full c-index, which includes these ICT types, presents a more favorable view of entity Section 508 conformance compared to the truncated indices from their respective years. A comparison with the truncated c-index, which excludes these ICT types, reveals the severity of specific accessibility challenges – particularly in the Low and Very Low conformance brackets – on ICT important to both public users and federal employees. These challenges hinder service delivery and employee productivity and underscore the need for consistent application of Section 508 standards.

For instance, in FY24, the truncated index places 67 more respondents in the Very Low conformance bracket compared to the full c-index, suggesting that these ICT types boost overall c-index outcomes. A similar trend is observed in FY23, where 54 additional reporting entities are classified as Very Low in the truncated index. This pattern highlights that, while the full c-index provides a broader, more comprehensive perspective, it is designed in a way that may not reveal some of the specific accessibility challenges reporting entities face.

Upon closer examination of the impact of replacing the 10 ICT types, the selection of ICT types in each year influenced conformance differently. In FY24, we saw a larger shift in conformance when comparing the full and truncated indices, suggesting that the ICT types introduced this year had a more pronounced effect on the overall c-index. In contrast, the ICT types used in FY23 had a smaller impact on the conformance brackets.

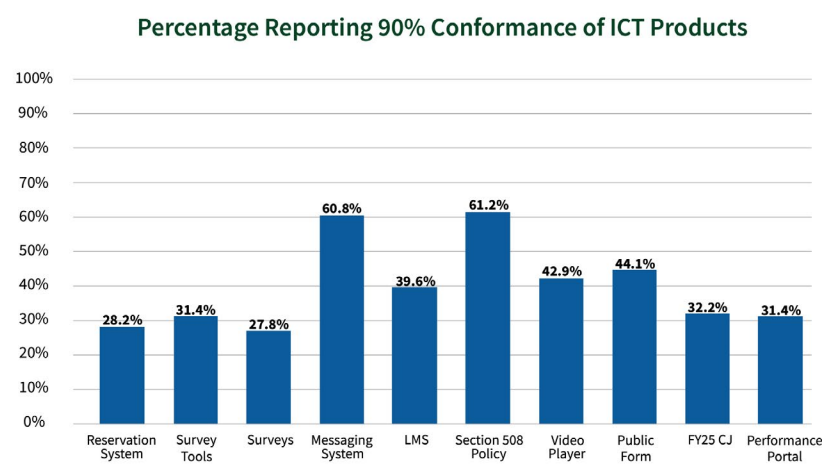
**Figure 5: Percentages of entities reporting 100% conformance for commonly used ICT products**



<sup>17</sup> The 10 ICT questions from FY23 asked about Time and Attendance system, most widely viewed required digital training course, enterprise email application, enterprise virtual meeting platform, custom developed desktop software/native mobile app, kiosks used by the public, telework agreement, enterprise Single Sign-On (SSO), W-2, and Section 508 feedback/complaint process.

The number of reporting entities with 90% or more conformance for ICT products increased , which suggests that while some ICT products may still have some accessibility issues, they may be close to fully conformant. The highest conformance percentage was still the publicly posted Section 508 policy at 61.2% of entities who conform to 90% or more of the standards followed closely again by enterprise-wide chat or real-time messaging system at 60.8% of entities. However, the lowest conforming category was surveys released by entities, with only 27.8% of reporting entities noting conformance with 90% or more of standards.

**Figure 6: Percentage of reporting entities reporting 90% or more conformance by products used internally and by the public (Q80-Q89)**



**Table 4. Reporting entity response count for Section 508 conformance level by ICT product category**

ICT Product Change	100% Conformant	90%-99% Conformant	50%-90% Conformant	Less Than 50% Conformant	Unknown	Not Applicable
Desk or Conference Reservation System	30	39	29	7	53	87
Survey Authoring Tool	37	40	31	3	95	39
Surveys	28	40	33	6	95	43
Chat/ Real Time Messaging System	80	69	30	2	50	14

<b>ICT Product Change</b>	<b>100% Conformant</b>	<b>90%-99% Conformant</b>	<b>50%-90% Conformant</b>	<b>Less Than 50% Conformant</b>	<b>Unknown</b>	<b>Not Applicable</b>
<b>LMS</b>	34	63	49	10	51	38
<b>Section 508 Policy</b>	104	46	22	3	36	34
<b>Video Player</b>	56	49	30	2	62	46
<b>Widely Used Public Fillable Form</b>	65	43	29	5	68	35
<b>FY25 CJ</b>	48	31	25	26	86	29
<b>Performance Portal</b>	17	60	34	6	67	61

This year, the Assessment asked several questions regarding the accessibility and functionality of enterprise-wide virtual meeting platforms, such as Zoom, Teams, Webex, Adobe Connect, and Google Meet. As most meetings now occur virtually, it is imperative that all federal employees and members of the public have access to accessible virtual meetings. An overwhelming majority of entities reported their virtual meeting platform can be accessed and used by all disability groups, suggesting broad efforts to promote inclusivity in digital communication tools. A majority also indicate their platforms incorporate features or functions to display captions, spotlight or pin American Sign Language interpreters, increase font sizes, restrict use of inaccessible features, and disable motion, demonstrating widespread attention to providing features that support users with disabilities.

## Maturity Key Findings

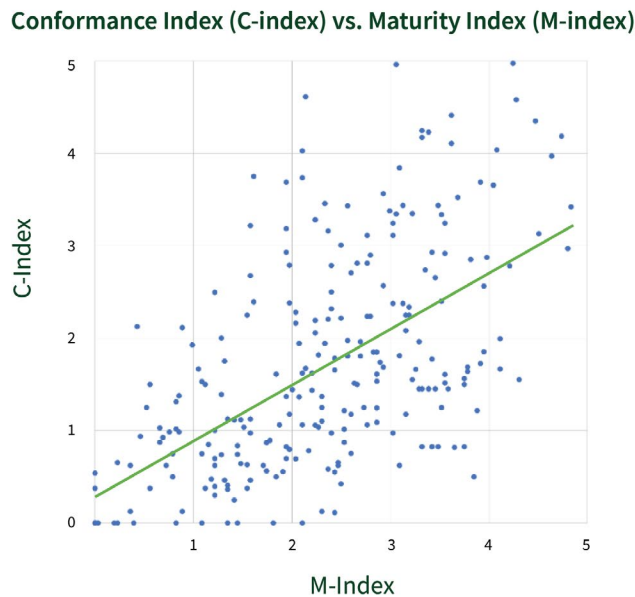
### Assessment Indices and Reporting Entity Scatter Plot

This Assessment targets two key areas of analysis to determine performance with respect to digital accessibility: conformance and maturity. Organization maturity with respect to accessibility is also a key factor in success for agencies. This includes several elements, such as having correct accessibility policies and hiring practices, as well as setting up the entity's IT accessibility program. If an entity is not mature, it will likely not be able to easily meet its target accessibility goals and create lasting, repeatable accessibility conformance results.

GSA combined the reporting entities' self-reported responses to get one estimate of a reporting entity's overall performance. Like last year, the maturity and conformance indices – based solely on the assessment responses – provide a comprehensive and quantitative assessment of Section 508

compliance across the federal government. The business function maturity index, referred to as “maturity” or “m-index,” quantified reporting entity responses to criteria across nine dimensions with equal weighting of each criteria. The operational conformance matrix, referred to as “conformance” or “c-index,” quantified 16 specific criteria in the Conformance dimension to assess how well reporting entities performed with respect to Section 508 implementation. The indices are on a 5-point scale, from zero to five. These indices are fully described in Appendix B: Methods, Descriptive Analysis.

**Figure 7: Scatter plot with trendline of all reporting entities’ conformance and maturity index results**



As depicted in Figure 7, there is a wide reach of performance on both the maturity and conformance indices across government. There is also a concentration of reporting entities towards the center of the graph, with less towards the bottom left corner of the graph (the lower performers) and an even smaller number of reporting entities in the top right corner (the higher performers). Finally, similar to last year, the trendline continues to show a positive relationship between maturity and conformance. **That is, more mature reporting entities tended to have higher conformance rates and vice versa.**<sup>18</sup>

## Reporting Entity Heat Map

Another way to look at this data is to break down each index identified above into increments from one to five, in order to group these reporting entities together. These break down into Maturity and Conformance “brackets” with assigned names for each of these on a 5-point scale, ranging from Very low to Very High, as shown in Table 5 below.

<sup>18</sup> The contrapositive is also true. That is, less conforming entities also tended to be less mature.

**Table 5. Index outcomes for m-index and c-index**

Bracket	Index Outcome
Very Low	0 to <1
Low	1 to <2
Moderate	2 to <3
High	3 to <4
Very High	4-5

Given the above outcomes, reporting entities can therefore be put into five groups according to maturity and conformance; for instance, there will likely be those that are determined to have Very Low Maturity or Very High maturity, and the same is true for conformance. With the five groups in maturity and conformance, there are 25 total bracket categories that a reporting entity may fall into, ranging from Very Low Maturity-Very Low Conformance on the lower end of outcomes to Very High Maturity-Very High Conformance on the high end of outcomes. Not all categories may have reporting entities falling within them, in fact there were two such categories for the FY23 Assessment, this year there are actually four.<sup>19</sup>

**Table 6. “Heat map” for where reporting entities fall within maturity and conformance brackets**

Conformance Index	Very High	0	0	2	6	5
	High	0	4	9	11	4
	Moderate	2	8	16	14	2
	Low	7	15	36	24	3
	Very Low	20	34	13	10	0
		Very Low	Low	Moderate	High	Very High
		Maturity Index				

Similar to the FY23 Assessment, a majority of reporting entities fall in the bottom 9 categories. However, about 61% of reporting entities (or 151) fell in these categories, whereas roughly 76% of reporting entities fell in these nine lower categories in FY23.

<sup>19</sup> The maturity-conformance categories Very Low-Very High, Low-Very High, Very High-Very Low, and Very High-Low; all do not have any reporting entities that fall in them for this assessment cycle.

This upward shift is due to the number of reporting entities in the High bracket for both maturity and conformance in FY24 compared to FY23, particularly those with high maturity. For maturity, approximately 27% fell into a high maturity category (High-Very Low, High-Low, etc.) versus only about 14% in FY23 (65 entities vs. 34). Conformance included 11% in FY24 versus only 9% in FY23 (28 entities vs. 22). Additionally, 14 entities fell into a very high maturity category (about 6%) vs. 9 in FY23 (or about 4%). Interestingly, the opposite is true for conformance with 13 entities falling in a very high conformance category in FY24 versus 17 in FY23 (or approximately 5% vs. 7%).

Of the 230 reporting entities that reported both years, data shows:

- 86 entities improved in both indices YOY.
- 53 entities declined in both indices YOY.
- 61 entities improved in m-index but declined in c-index.
- 29 entities declined in m-index but improved in c-index.

Table 7 below shows the total number of entities that changed YOY for each index. Most represent incremental change, though some are more significant at 0.5 or more on a 5-point scale.

**Table 7: YOY Changes in M-Index and C-Index**

<b>M-Index Improvement YOY</b>	<b>M-Index Decline YOY</b>	<b>M-Index No Change YOY</b>	<b>C-Index Improvement YOY</b>	<b>C-Index Decline YOY</b>	<b>C-Index No Change YOY</b>
148 entities	8 entities	0 entities	115 entities	114 entities	1 entity

This increase in maturity, particularly in some areas such as training, as shown below, reflect entity investments in accessibility efforts across the enterprise. While data does not yet reflect improvement, one would expect these investments to lead to more conformant ICT at the respondent level and across government.

## Maturity Dimension Outcomes

The average of all respondent maturity scores (all dimensions, all reporting entities) improved in FY24 but stayed Moderate at 2.37 out of 5, up from 2.17 in FY23.

The Assessment measures accessibility maturity within an organization through 38 questions. These questions are broken down into nine key dimensions listed below:

- IT Accessibility Program Office
- Policies, Procedures, and Practices

- Communications
- Content Creation
- Human Capital, Culture, and Leadership
- Technology Lifecycle Activities
- Testing and Validation
- Acquisition and Procurement
- Training

In FY23, the two lowest performing dimensions, governmentwide, were the Human Capital, Culture, and Leadership dimension and the Training dimension. For this year, they are the same but switched. Last year Training was the lowest Dimension at 1.57 with Human Capital, Culture, and Leadership at 1.63. In 2024, these scores are 2.06 and 1.93, respectively. This represents a 31% improvement in the average Training maturity outcomes across government. Human Capital also saw an improvement of about 18% across the government.

Overall, approximately 28% of entities (68) had Human Capital, Culture, and Leadership as their worst dimension (or one of their worst), and 63 (or approximately 26%) had Training as their worst dimension. So, while these dimensions saw an improvement year over year, they are still the areas of most needed development or investment going forward to improve average reporting entity maturity outcomes.

The highest performing maturity outcome was Content Creation at 2.69, followed by Communications at 2.63 and the IT Accessibility Program dimension at 2.55. Overall, approximately 28% (69) had Content Creation as their best maturity outcome, while 55 or about 22% had Communications as their best outcome. See the full list of maturity outcomes in Table 8.

**Table 8. Average Maturity Dimension Outcomes Across Government**

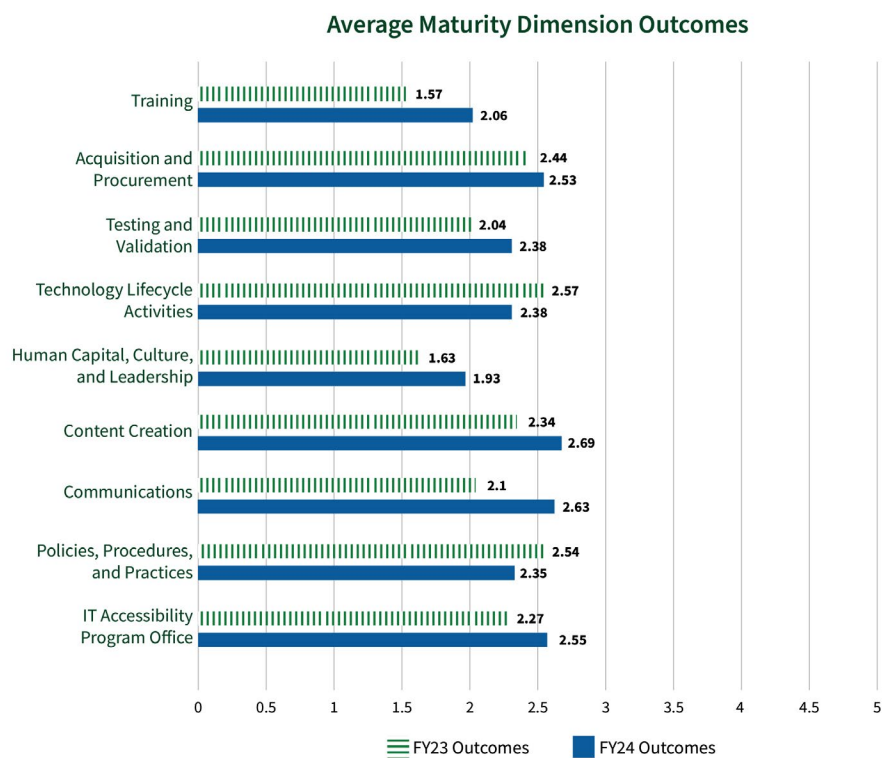
<b>Dimension</b>	<b>Average FY24 Federal Outcome</b>	<b>Average FY23 Federal Outcome</b>
<b>IT Accessibility Program Outcome</b>	2.55	2.27
<b>Policies, Procedures, and Practices</b>	2.35	2.54
<b>Communications</b>	2.63	2.10
<b>Content Creation</b>	2.69	2.34



Dimension	Average FY24 Federal Outcome	Average FY23 Federal Outcome
<b>Human Capital, Culture, and Leadership</b>	1.93	1.63
<b>Technology Lifecycle Activities</b>	2.38	2.57
<b>Testing and Validation</b>	2.38	2.04
<b>Acquisition and Procurement</b>	2.53	2.44
<b>Training</b>	2.06	1.57

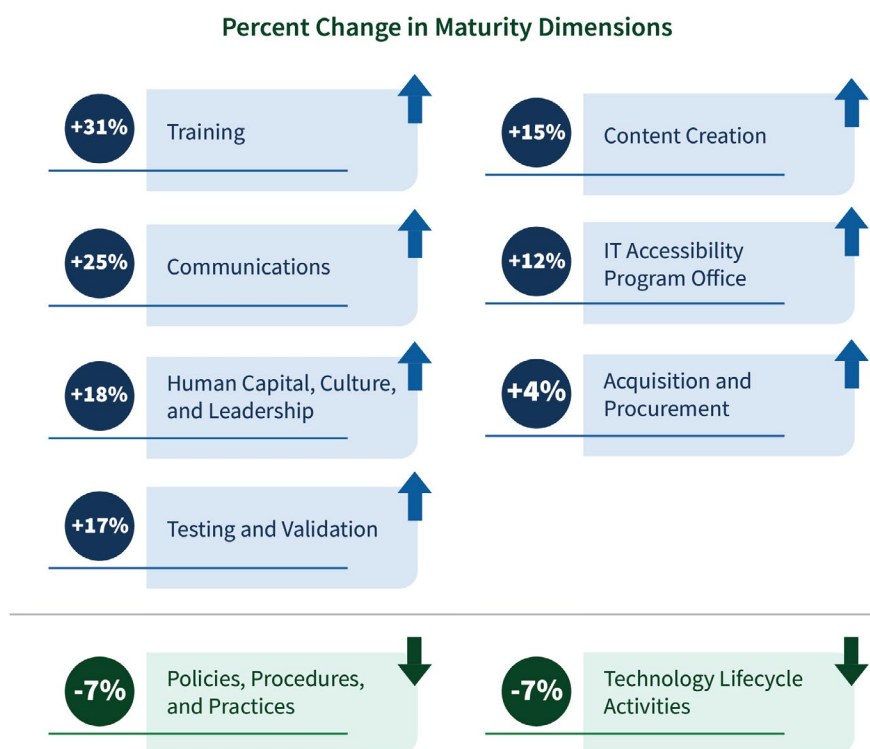
Below, the FY 24 outcomes are depicted in the chart:

**Figure 8. Average FY24 Maturity Dimension Outcomes with FY23 for Comparison**



The figure below demonstrates year over year (YOY) change.

**Figure 9. Percent Change YOY of Maturity Dimensions**



## Section 508 Program and Staff Analysis

### Section 508 Program Managers

Some reporting entities noted that one of the top areas they focused on for improvement since the FY23 Assessment was hiring or designating a Section 508 Program Manager (PM).<sup>20</sup> Overall, entities reported improvement in staffing and an increase in the number of hours dedicated by Section 508 PMs to the Section 508 program. **In FY24, entities who reported a part-time Section 508 PM increased from 51% to 56%.** The governmentwide average of part-time PMs dedicated to the Section 508 program increased from 8 hours to 8.6 in FY24.

<sup>20</sup> Throughout this Assessment, Section 508 PM and Section 508 Program are used; reporting entities may have an equivalent with the same function but a different name. When Section 508 PM or Section 508 Program is used, we also account for reporting entity equivalents.

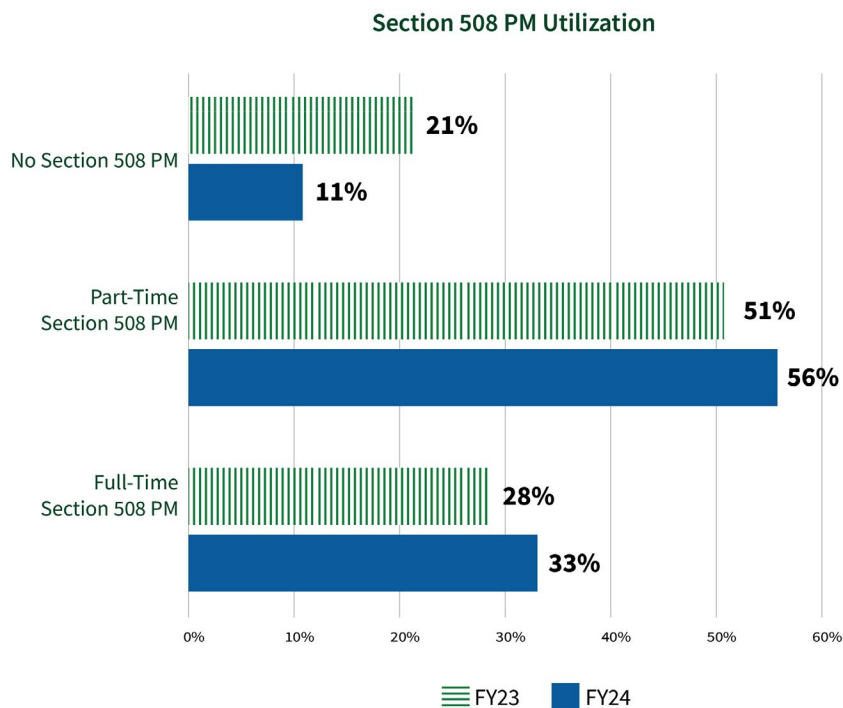


Please note that the terms “reporting entity” and “respondent” are not synonymous with “agencies” as used in M-24-08. Components are not required to implement M-24-08 independently from their parent agency, so may not have their own Section 508 PM or equivalent.

As shown in Figure 10, 33% of reporting entities reported a full-time Section 508 PM or equivalent, improving from 28% in FY23. Only 11% of respondents reported no Section 508 PM or equivalent, down from 21% in FY23.

On average, Section 508 PMs across government spent 17.9 hours per week on Section 508, improving from 15.4 hours in FY23 and resulting in a 16.2% increase in time spent by Section 508 PMs (WSRT: extremely statistically significant).

**Figure 10: Comparison of governmentwide Section 508 PM or equivalent utilization (Q4)**



Although there has been a reported rise in staffing and utilization for Section 508 PMs, further efforts are needed to clearly define the roles and responsibilities associated with this position. One recommendation from the FY23 Assessment was to ensure sufficient Section 508 PM utilization that includes authority that is proportionate for the Section 508 program. When entities were asked about the status of the reporting entity’s Section 508 PM or equivalent position, varying responses showed about one-third of all reporting entities or 76 respondents lacked any formal Section 508 PM to perform digital accessibility duties. However, entities showed a small, meaningful increase (WRST: extremely statistically significant), with well over half of all entities now having a Section 508 PM with clearly defined roles, responsibilities, and Section 508-aligned performance measures.<sup>21</sup> Additional results show:

- 65 entities or 26.7% reported no formal position or duties assigned to perform the Section 508 PM role.

<sup>21</sup> For an explanation of “(WRST)”, please see Pre/Post Analysis in Methods.

- 11 entities or 4.5% reported the Section 508 PM has clearly defined roles and responsibilities but no personnel are currently performing the duties.
- 96 entities or 39.3% reported that the Section 508 PM is currently staffed with clearly defined roles and aligned performance measures.
- 32 entities or 13.1% reported the Section 508 PM is currently staffed with clearly defined roles and meets or exceeds aligned performance measures and has sufficient authority.
- 40 entities or 16.4% reported the Section 508 PM is currently staffed with clearly defined roles and meets or exceeds aligned performance measures and has sufficient authority and uses feedback loops to continually make program improvements.<sup>22</sup>

Table 9 depicts the average hours per week Section 508 PMs dedicate to their Section 508 Program, by maturity bracket, with a comparison to FY23. This continues to show that as maturity increases so does the average number of hours per week a Section 508 PM dedicated to the Section 508 Program; or vice versa, the more time a Section 508 PM dedicates to their program, the more mature the program. For the Very High and High Maturity brackets, we see a decrease in overall hours per week but we see an average increase for the Very Low, Low and Moderate maturity brackets.<sup>23</sup>

**Table 9: Average Section 508 PM hours per week dedicated to their Section 508 Program by maturity bracket**

<b>Maturity Bracket</b>	<b>FY24 Average Section 508 PM Hours Spent Per Week</b>	<b>FY23 Average Section 508 PM Hours Spent Per Week</b>
<b>Very High</b>	35 hours	31 hours
<b>High</b>	23 hours	26 hours
<b>Moderate</b>	20.5 hours	19 hours
<b>Low</b>	11.5 hours	10 hours
<b>Very Low</b>	4.5 hours	3 hours

The FY23 Assessment recommended agencies ensure sufficient Section 508 PM utilization because the greater the utilization of the Section 508 PM, generally the better the reporting entity's conformance outcomes. Although some progress has been made and respondents are starting to prioritize Section 508 Program Managers more effectively, there is still work to be done.

<sup>22</sup> One entity did not respond to this question and only 244 responses were received.

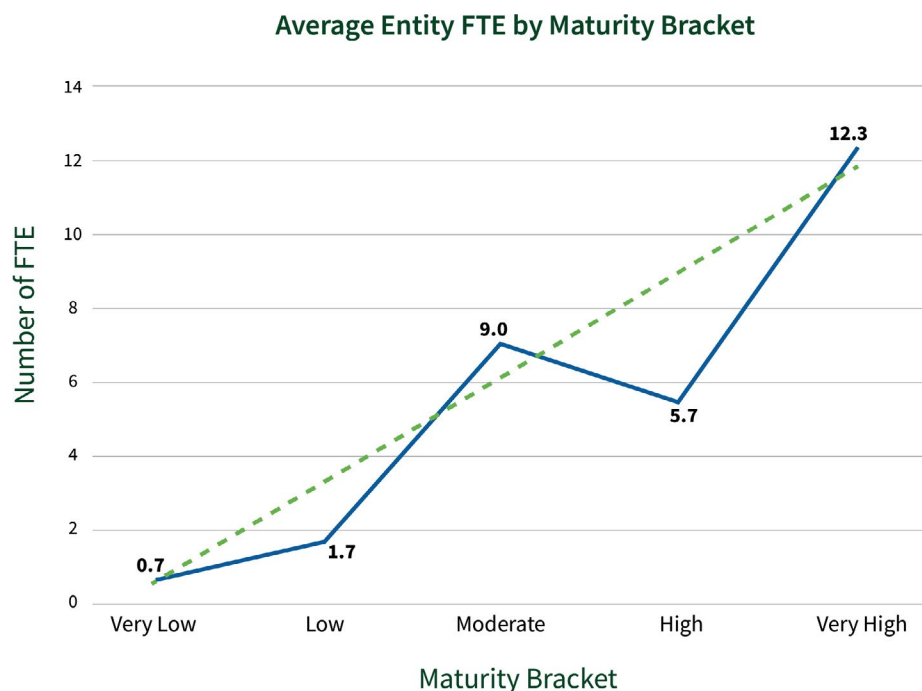
<sup>23</sup> The average Section 508 PM hours by conformance bracket shows a little more variance, with an average of 23.6 hours per week for Very High, 25.2 hours per week for High, 18.8 hours per week for Moderate, 19.6 hours per week for Low, and 11.9 hours per Very Low.

## Section 508 Full Time Equivalents (FTEs)

While some entities reported increasing Section 508 staffing and contractor resources over the past year, many entities noted that resourcing as a whole was – and remains – a challenge. Reporting entities continue to report varying levels of Section 508 FTEs but entities overall reported slightly more FTEs on average compared to FY23. The data shows:

- In FY24, 75 reporting entities reported less than one Section 508 FTE, which is a 19% improvement since FY23. Only 19 entities reported no FTEs, which is a 47% improvement since FY23.
- Governmentwide, the FY24 average number of Section 508 FTEs was at 5.5 compared to 4.3 in FY23, comprising an average of 3.7 federal Section 508 FTEs versus 2.7 in FY23 and 1.8 contractor Section 508 FTEs versus 1.6 in FY23.<sup>24</sup>

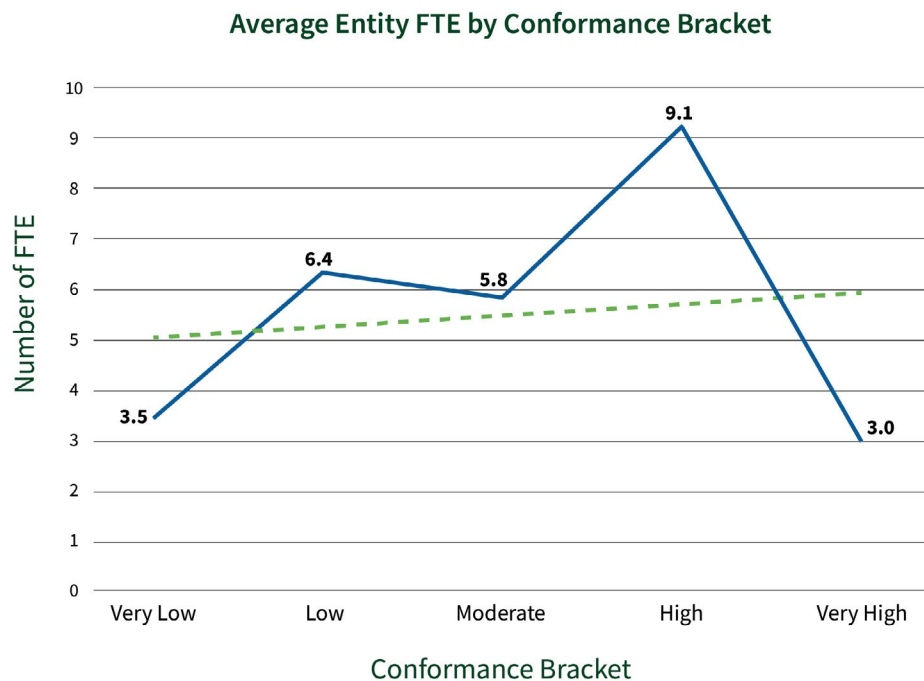
**Figure 11. Average reporting entity FTE by maturity bracket**



As Figure 11 shows, there is a positive correlation between the total number of FTEs and the maturity outcomes for that reporting entity. More well-resourced organizations tend to be more mature with respect to accessibility considerations across the business landscape. The reverse is also true: less mature organizations tend to be those that are not well resourced.

<sup>24</sup> Three reporting entities reported very high numbers of FTEs that also triggered data validation flags, including one entity who reported more federal Section 508 FTEs than federal employees and another that reported the exact same number of federal employees and federal Section 508 FTEs. Entities were provided an opportunity to affirm or correct data but only one entity chose to do so. Excluding the remaining two entities, total Section 508 FTEs fell to 4.7, composed of 3 federal FTEs and 1.7 contractor FTEs.

**Figure 12. Average reporting entity FTE by conformance bracket**



Similar to maturity, as shown in Figure 12, FTE by conformance shows a positive relationship between the number of resources and the conformance outcomes. However, as opposed to maturity, the relationship between FTEs and conformance outcomes is slight. In fact, although there is a positive trend, Low and Moderate performing entities reported slightly more FTEs on average than High or Very High performing entities.

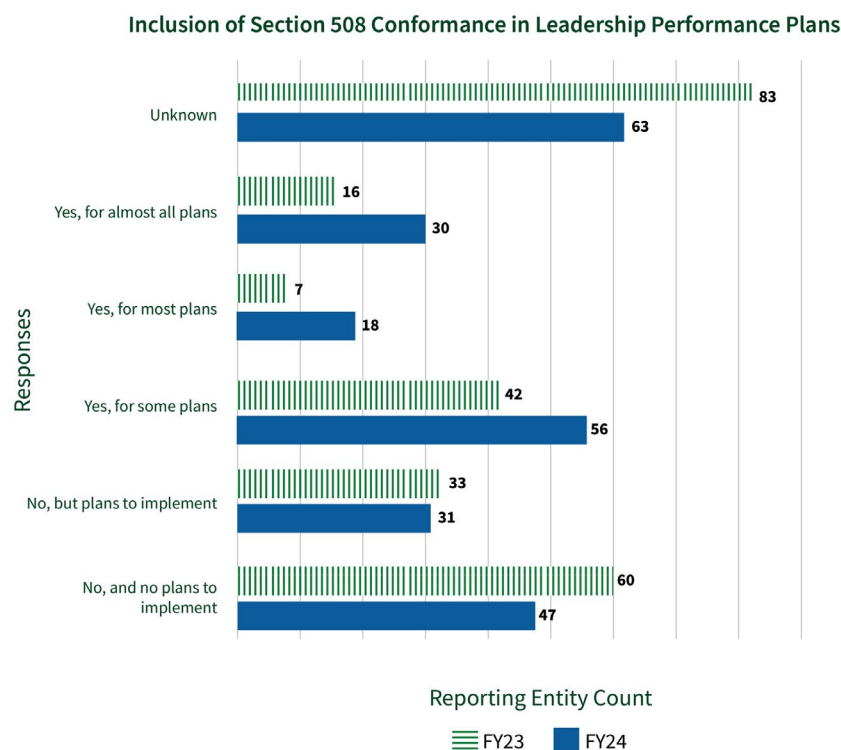
## **Section 508 Competencies, Leadership, and Management**

In the Assessment, FTE only factors in Section 508 FTEs directly supporting the reporting entity Section 508 Program. While many entities have Section 508 Subject Matter Experts (SMEs) embedded throughout the entire lifecycle – from business requirements development to deployment and operations and maintenance – being able to reliably estimate all personnel who perform digital accessibility-related activities is challenging, if not impossible. We expect the overall number of FTEs who perform digital accessibility-related activities throughout the reporting entity is much higher than the above count reflects. To address this, several questions emphasized the key competencies of all staff involved in ICT conformance. Like last year, leadership participation was seen to be a hindrance to implementation of accessibility efforts across the enterprise. As leadership engagement is key to advancing accessibility, entities should continue to work to promote accessibility as a priority.

**Data shows a 60% increase YOY in the number of entities who indicated they include Section 508 conformance in ICT-related leadership and management performance plans**, with 26% of respondents selecting this option in FY23 and 42% of respondents or 104 entities selecting this in FY24. This indicates a small, meaningful increase (WRST: extremely statistically significant) YOY to include Section 508 conformance in ICT-related leadership and management performance plans, with half of the reporting entities now indicating a timetable to begin its implementation. In FY24, 32% of respondents or 78 entities reported not including Section 508 compliance in any ICT-related leadership and management performance plans, which is a decrease from 40% overall in FY23. Additionally, 19% of respondents or 47 of those entities noted they have no plans to do so, down from 27% in FY23, showing a 30% decrease YOY. Figure 13 below depicts the further breakdown of responses in comparison to FY23, **showing an overall increase in the number of entities who responded affirmatively to inclusion of Section 508 in ICT-related management performance plans.**

Although the Human Capital, Culture, and Leadership Dimension improved from 1.63 in FY23 to 1.93 in FY24 – about an 18% increase YOY across the government – there is still room for improvement. This remains one of the lowest performing dimensions. In fact, in FY24, it is the lowest dimension. While improvements were reported, digital accessibility remains deprioritized for some reporting entities.

**Figure 13: YOY response count for inclusion of Section 508 conformance in ICT-related leadership and management performance plans (Q44)**





Other digital accessibility competency, skills, and knowledge response highlights include:

- Entities noted substantially improving how often ICT accessibility skills and capabilities are integrated into competency and professional development planning for staff who are responsible for ensuring ICT is accessible. There was a 79% improvement YOY in the number of entities who said they do not integrate ICT accessibility into professional development plans, with 13.5% of respondents or 33 entities in FY24 selecting this response compared to 63% in FY23.
- 35% of respondents or 86 entities in FY24 noted regularly, frequently, or almost always integrating ICT accessibility skills and capabilities into competency and professional development planning for staff responsible for accessible ICT.
- In FY24, 40% of entities responded that staff who are involved in technology development lifecycle activities either sometimes or never have sufficient knowledge and skill to ensure ICT is Section 508 conformant, compared to 50% in FY23, resulting in a 20% decrease YOY. However, in FY24, **32 of those reporting entities said they have no knowledgeable staff compared to 17 entities in FY23, resulting in an 88% increase YOY.**
- In FY23, 64% of entities reported they had no or only some development and testing professionals trained in Section 508 web testing. There is a slight improvement in FY24, with **60% of respondents or 146 entities still saying they have no or only some development and testing professionals trained in Section 508 web testing.** This high percentage may suggest that staff responsible for ICT conformance testing may not have sufficient skills nor training to accurately test for Section 508 requirements.
- **Only 22% of entities reported they require specific training curriculum or certification in Section 508 web testing for accessibility web testers.**

## Staff Training

Training was the lowest performing dimension last year and informed a FY23 Assessment recommendation that agencies should require mandatory annual Section 508 training for specific roles and responsibilities. In FY24, training is the second lowest dimension, however **entities noted increased investments in training over the last year, which is reflected in this year's data.** Last year, only 22% of entities implemented a mandatory Section 508 training for all employees. In FY24, **34% of entities reported requiring a Section 508 training for employees, with the majority of those requiring training on a regular basis such as annually, leading to a 51% increase YOY.**

Mandatory Section 508 training by roles and responsibilities substantially increased YOY, with all roles and responsibilities noting an increase in mandatory Section 508 training and 68% fewer entities reporting Section 508 training is not required for employees. **The largest increase in required mandatory Section 508 training was for purchase card holders and front line staff, both of which increased 300% YOY.** Table 10 further details the response count YOY for employee roles and responsibilities with mandatory Section 508 training.



**Table 10: Comparison of response count for employee roles and responsibilities for mandatory Section 508 Training**

<b>Roles and Responsibilities with Mandatory Section 508 Training</b>	<b>FY23 Entity Count</b>	<b>FY24 Entity Count</b>	<b>Percentage of Change</b>
<b>Required for All Employees</b>	56	75	34%
<b>Section 508 Project Manager</b>	58	108	86%
<b>Project Managers</b>	11	31	182%
<b>Contracting Officers</b>	17	37	188%
<b>Purchase Card Holders</b>	7	28	300%
<b>Developers</b>	19	45	137%
<b>Document Authors</b>	N/A	32	N/A
<b>Web Content Managers</b>	36	63	75%
<b>IT Help Desk</b>	9	25	178%
<b>Front Line Support Staff</b>	6	24	300%
<b>Other</b>	N/A	30	N/A
<b>Unknown</b>	N/A	10	N/A
<b>Not Required for Employees</b>	114	68	-68%

Additionally, [M-24-08](#) stated “[a]gencies 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.” **Last year, 44% of entities lacked any Section 508 training plan. In FY24, this number decreased by 17%, with 37% of respondents or 91 entities selecting they have no Section 508 training plan defined, representing a small, meaningful change** (WRST: extremely statistically significant). Additionally, for FY24, 23% of entities reported that their training plan identifies training needs and training curriculum for most or almost all ICT roles and responsibilities.

Additional FY24 training highlights include:

- Only 39 entities or 16% report no Section 508 training is offered.
- 91 entities or 37% reported that an optional Section 508 training is offered that employees sometimes take.

- 53 entities or 22% responded that they never offer ICT accessibility-related training to employees, including training on guidance, templates, and tools for creating accessible content.
- 74 entities or 30% responded that they offer ICT accessibility-related training to employees, including training on guidance, templates, and tools for creating accessible content 7 or more times a year.
- 78 entities or 32% indicated they distribute communication with employees and contractors about digital accessibility approximately 6 or more times a year, with 109 entities or 44% selecting they distribute communication no more than 2 times a year.<sup>25</sup>

Respondents also reported on initiatives and investments over the last year to improve digital accessibility training, including:

- Conducting Section 508 awareness training campaigns.
- Identifying Section 508 training needs.
- Implementing Section 508 training plans.
- Increasing frequency of training, including general awareness and understanding of digital accessibility requirements.
- Continuing to invest in workforce training through train-the-trainer training, one-on-one training, webinars, workshops, and lunch and learns.
- Moving Section 508 training online to reach a broader audience, including some entities who released role-based, on-demand Section 508 training content.
- Targeting training for content managers, program managers, and development teams.
- Implementing employee training metric tracking.
- Proposing Section 508 training by roles and responsibilities or a formal Section 508 training plan to leadership.

Some challenges also remain, including resourcing limitations, small agencies struggling with staff training, limited budgets, and a high turnover rate of trained staff. Some entities requested efficiencies in sharing training content; instead of creating their own content, training content would be shared amongst the agency as a whole or across agencies. This would have positive impacts on small and micro agencies who do not have the resources and would streamline training across agency components.

Reporting entities have made substantial progress in enhancing the training, responsibilities, and capabilities of staff supporting Section 508 compliance. However, there is still room for improvement. Although the Human Capital, Culture, and Leadership Dimension improved from 1.63 in FY23 to 1.93

<sup>25</sup> Response options underwent significant revision in FY24 while the intent of the question stayed the same. Nevertheless, the YOY difference indicates a moderate, meaningful increase (WRST: extremely statistically significant).

in FY24 – about an 18% increase YOY across the government – it remains one of the lowest performing dimensions. In fact, in FY24 it is the lowest dimension.

Following a FY23 Assessment recommendation for agencies to require mandatory annual Section 508 training for specific roles and responsibilities, entities invested significantly in training. Entities reported a 51% increase in mandatory Section 508 training adoption and notable growth in role-specific requirements, especially for purchase card holders and front-line staff – both of which saw a 300% increase. Another FY23 recommendation suggested agencies should ensure sufficient Section 508 Program Manager utilization. Although reporting entities improved staffing of the Section 508 PM, about one-third of entities still reported lacking formal Section 508 PM staffing. Additionally, there was an improvement in efforts to incorporate ICT accessibility skills into professional development, with only 13.5% of entities excluding these skills from planning in FY24, down from 63% in FY23. Together, these advancements signal an increased awareness of the demand for skilled Section 508 staffing and the need for investment in ongoing training and professional development. Continued efforts to prioritize digital accessibility will also ensure downstream impacts on more conformant ICT.

## Section 508 Program

---

Please note the terms “reporting entity” and “respondent” are not synonymous with “agencies” as used in M-24-08. Components are not required to implement M-24-08 independently from their parent agency, so they may not have their own Section 508 program.

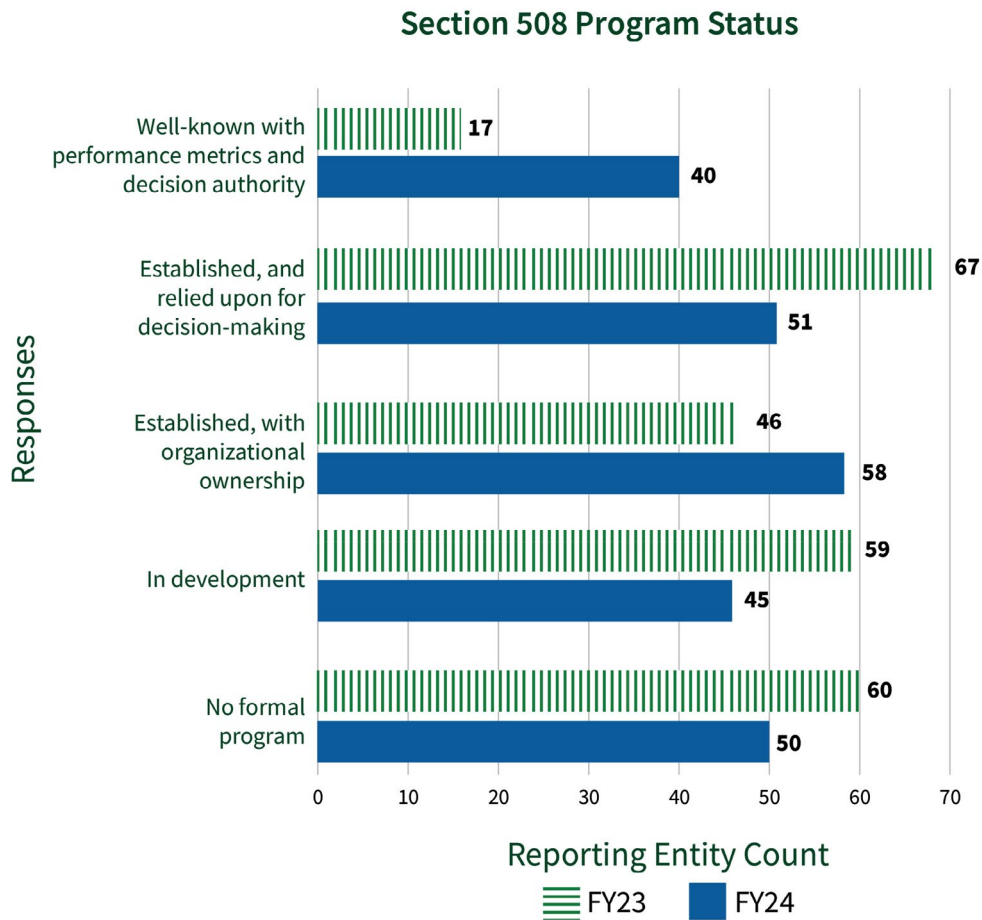
---

The Assessment shows improvements in reporting entities’ Section 508 programs, specifically in the status, influence, and resourcing. Respondents reported a 135% increase in Section 508 programs that are widely known, relied upon, and have decision making authority. 40 entities selected this option in FY24 compared to only 17 in FY23.<sup>26</sup> Furthermore, the YOY difference indicates an improvement in the available Section 508 resources such as training, tools, staff support, etc. In FY23, half of the reporting entities noted that while they did identify resource needs, the ones provided or available were insufficient to support the needs of the Section 508 program’s or equivalent. This improved in FY24 by a moderate, meaningful increase (WRST: extremely statistically significant), with half of the reporting entities (from 1% to 59%) indicating some resource needs are met. At the same time, we observed a 20% YOY improvement in the number of entities who stated they have no formal Section 508 program or that the program was in development, with 39% of entities selecting these options in FY24 compared to 48% in FY23.

---

<sup>26</sup> One entity did not answer this question; for FY24 we have 244 responses.

**Figure 14. YOY comparison of response count for status of Section 508 program or equivalent (Q29)**



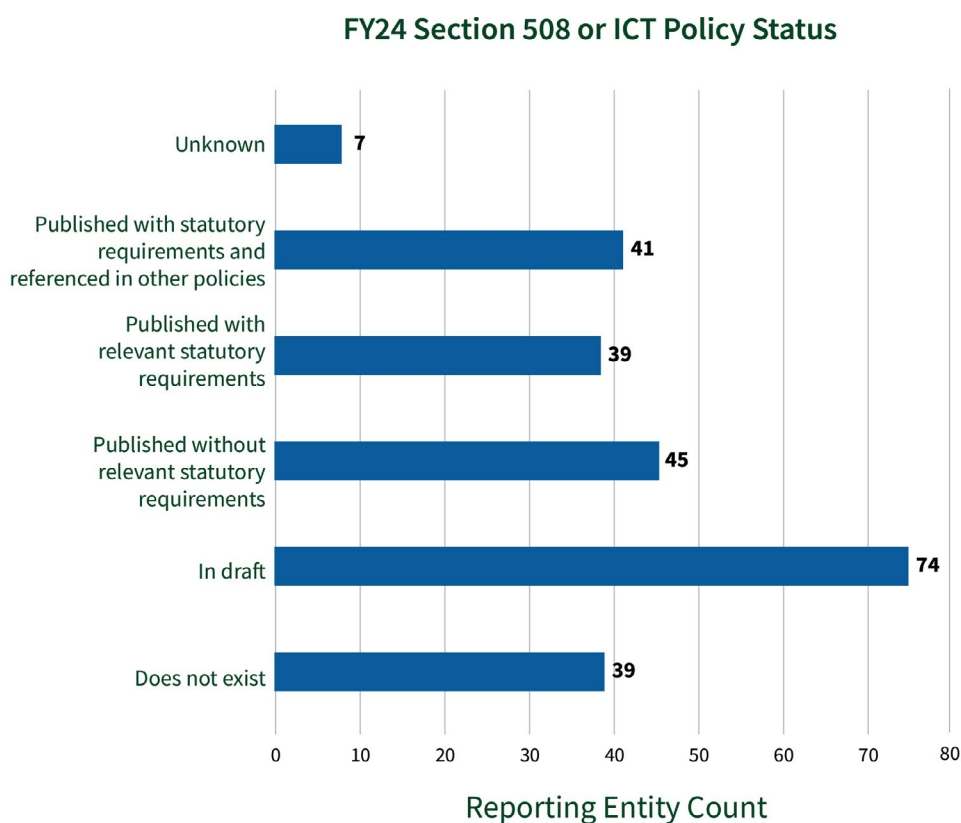
Please note that the terms “reporting entity” and “respondent” are not synonymous with “agencies” as used in M-24-08. Components are not required to implement M-24-08 independently from their parent agency, so they may not have their own Section 508 or digital accessibility policy.

The same number of entities (39) reported YOY that their Section 508 or ICT accessibility policy does not exist. In FY24, there was a significant increase, 146.6%, in the number of entities who said their Section 508 policy is in draft, specifically 74 entities in FY24 compared to only 30 in FY23. Half as many entities reported not knowing the status of their Section 508 policy with 7 entities selecting this in FY24. Overall, just over half of all entities – 125 entities or 51% – noted their Section 508 policy was signed, with:

- 45 entities noting the Section 508 policy was published but does not include all relevant M-24-08 and Section 508 statutory requirements.
- 39 entities noting the Section 508 policy was published and includes all relevant M-24-08 and Section 508 statutory requirements.

- 41 entities noting the Section 508 policy is published, includes all relevant M-24-08 and Section 508 statutory requirements, and is referenced in other relevant policies.<sup>27</sup>

**Figure 15: FY24 response count for status of Section 508 or ICT accessibility policy (Q34)**



Respondents listed several investments in their Section 508 program but also noted primary challenges in implementing and complying with Section 508. The top five responses were:

- Lack of staffing resources: 184 respondents or 75%.
- Lack of general awareness: 124 respondents or 51%.
- Lack of or inadequate training: 120 respondents or 49%.
- Lack of funding or budget: 112 respondents or 46%.
- Lack of or inadequate considerations early in the ICT lifecycle management process: 104 respondents or 42%.

When asked the top five items that would be the most helpful in implementing Section 508 in the reporting entity, the top responses selected were:

- Additional funding to aid Section 508 implementation: 171 respondents or 70%.

<sup>27</sup> Response options underwent editing and one response option was added in FY24, which does not allow for a direct comparison YOY.

- More staff adequately trained to implement Section 508 requirements: 155 respondents or 63%.
- More ICT accessibility subject matter experts: 93 respondents or 38%.
- Stronger Section 508 awareness across the reporting entity: 83 respondents or 34%.
- Better access to ICT testing tools: 70 respondents or 29%.

As the findings above indicate, there is opportunity to advance the maturity of entities' Section 508 programs. One hundred and thirteen (113) entities currently lack a Section 508 or ICT Accessibility policy. Developing and implementing policies that align with Section 508 standards, as well as other relevant laws and regulations, will provide a foundation for improving these programs. Given that more mature entities typically achieve better conformance outcomes, this approach is likely to lead to improved results across the federal government as a whole.



Respondents selected how often their Section 508 program engages internally or externally with disability-related affinity groups to inform ICT accessibility program maturity. The majority of respondents, 132 respondents or 54%, selected they sometimes or never engage with disability-related affinity groups. Seventy-seven (77) respondents or 31% noted they sometimes, regularly, or frequently engage.

## Accessibility Conformance Testing and Technology Lifecycle

The Assessment continued to ask questions about outcome-based results to determine whether policies, practices, and procedures were effectively leading to Section 508 conformant ICT. The average c-index value for all reporting entities was 1.74 out of 5, indicating a low level of compliance and highlights that policies, practices, and procedures are not yet resulting in more conformant ICT.

### ICT Testing Outlook

As anticipated, most reporting entities continue to utilize a mix of automated and manual tools for digital accessibility testing. While manually testing all ICT may not be feasible due to resourcing, strategically combining automated tools with manual testing enables reporting entities to achieve both broad coverage and depth in their testing.

The FY24 Assessment asked a new question to better understand how many entities have conformance test processes used to evaluate different types of ICT. The results showed an overwhelming majority – 211 respondents – use a Section 508 conformance test process for web content. Additional data shows:

- 180 respondents use an electronic documents test process.
- 162 respondents use a software test process.
- 101 respondents use a mobile application test process.
- 89 respondents use a hardware test process.
- 30 respondents use a kiosk test process.
- 23 respondents use no test processes listed.

We continued to ask respondents what manual or hybrid testing methodology they use for digital accessibility testing. Data shows an increase governmentwide in the methodologies used except for the reporting entity-specific methodology, which showed no change. Additionally, the highest percentage reported for a standalone methodology was Trusted Tester 5.x for web, meaning some entities only use Trusted Tester as their test process. Two hundred two (202) respondents reported using one or more of the manual or hybrid ICT accessibility test methodologies for web content shown in Table 11 below:

**Table 11: Testing Methodologies used by respondents YOY**

<b>Methodology</b>	<b>FY23 Number of Reporting Entities Using Specified Methodology</b>	<b>FY24 Number of Reporting Entities Using Specified Methodology</b>	<b>% Change YOY</b>
<b>Manual Testing with Developer Tools</b>	61%	76%	22% increase in utilization
<b>Assistive Technology</b>	48%	58%	18% increase in utilization
<b>Manual Code Inspection</b>	41%	57%	37% increase in utilization
<b>Trusted Tester 5.x</b>	39%	49%	24% increase in utilization
<b>Reporting Entity-Specific Test Methodology</b>	29%	29%	No Change

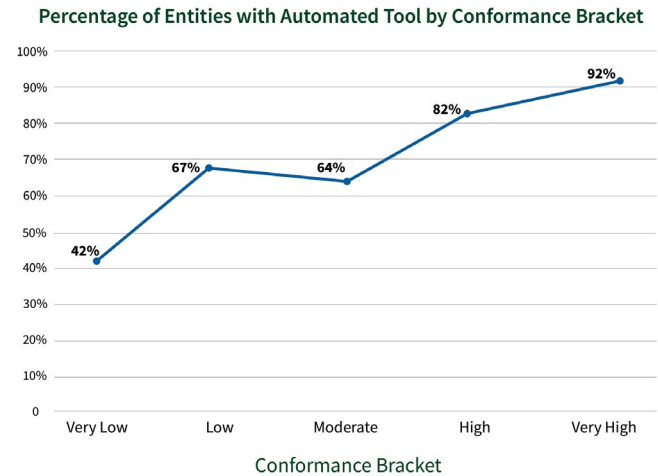
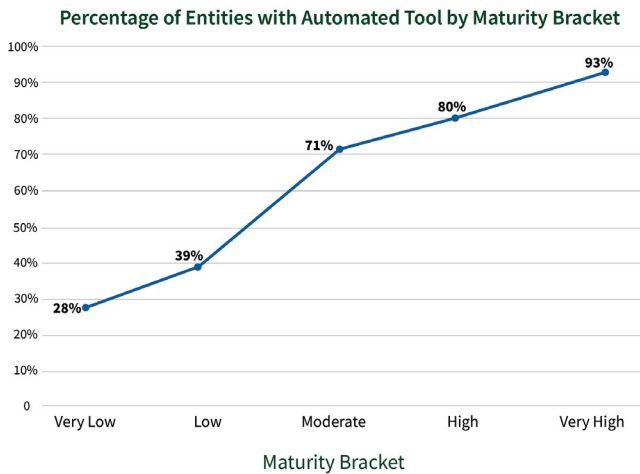
Additionally, YOY data revealed no change, with 61% of reporting entities, or 151 respondents in FY24, using at least one automated accessibility testing tool for comprehensive, large-scale monitoring of web content. Of those reporting entities, 84% responded that personnel who use the tool and interpret the results received training on the tool, increasing from 67% reported in FY23. However, 83 respondents or 34% reported not using any automated accessibility tool. Figure 16 and



Figure 17 show the percentage of entities that employ at least one automated tool by maturity and conformance brackets.

**Figure 16. Percentage of entities with an automated testing tool by Maturity Bracket**

**Figure 17. Percentage of entities with an automated testing tool by Conformance Bracket**



In Figures 16 and 17, the percentages of each overall category with the same conformance bracket (Very Low-Very Low, Low-Very Low, or Moderate-Very Low, etc.) were averaged and then included in the maturity and conformance charts. Generally, the higher the conformance or maturity, the higher the percentage of reporting entities with automated testing tools, which is similar to the discussion of average resources per entity by bracket discussed in previous sections.

One of the top primary challenges noted by 104 entities was a lack of or inadequate considerations at the early stage of the ICT lifecycle management process. As explained below, the Assessment continued to ask how often Section 508 conformance is integrated throughout technology development lifecycle activities:

- Similar to last year, just over half of the reporting entities – 53% in FY24 compared to 51% in FY23 – reported Section 508 conformance is regularly, frequently, or almost always integrated throughout technology development lifecycle activities, with 23% of those almost always integrating Section 508.
- Conversely, about **41% of all FY24 respondents reported they sometimes or never integrate Section 508 conformance into technology development lifecycle activities or don't know how often this occurs.**

The Assessment asked each reporting entity how often they implement and produce reliable test results using standard processes for validating web content conformance to Section 508 standards. The data for FY24 shows **60% of entities reporting they regularly, frequently, or almost always**



**implement a standard process**, which is 25% or more of the time. The majority of those entities said they almost always implement a standard process. One third or 33% of entities never or only sometimes implement a standard test process.

Entities reported increasing the frequency in which they conduct testing on web content as part of standard operations, with a decrease in who do not perform testing.<sup>28</sup> When asked how often reporting entities conduct comprehensive conformance validation testing for web content, both internet and intranet, prior to deployment, GSA found that:

- 31% of entities stated they frequently or almost always perform manual testing 60% or more of the time.
- Slightly more entities – 36% – reported they frequently or almost always perform comprehensive automated testing on web content prior to deployment.
- 42% of respondents or 104 entities reported they sometimes or never conduct comprehensive manual tests on web content for Section 508 conformance, an improvement from 48% in FY23. The YOY difference indicates a small, meaningful increase (WRST: extremely statistically significant) suggesting improvement as more reporting entities are moving towards regular testing.
- 41% of respondents or 101 entities reported they sometimes or never conduct comprehensive automated tests on web content for Section 508 conformance, an improvement from 45% in FY23, noting a small, meaningful increase (WRST: extremely statistically significant).

M-24-08 guidance stated that “prior to deployment, agencies should test and validate design and development solutions with individuals with disabilities and assistive technology users.” Additionally, the FY23 Assessment made recommendations for agencies to explore ways to include users with disabilities throughout the technology lifecycle. While the majority of respondents still noted they sometimes or never conduct user testing with people with disabilities prior to deployment to address all applicable Section 508 standards, there was a 21.6% decrease YOY in the number of entities who selected this option, with 71% of entities in FY24 compared to 89% of entities in FY23. Similar percentages YOY were found in those who regularly or frequently conduct the aforementioned user testing, with 11% in FY24 compared to 10% in FY23.

Respondents also noted an increase in engaging users with disabilities YOY<sup>29</sup>:

- 47% of entities selected engaging users with disabilities in defining user needs, compared to 15% in FY23.
- 38% of entities selected engaging users with disabilities in development of Section 508 conformance validation test processes, compared with 12% in FY23.

---

<sup>28</sup> While Conformance data does not support an increase in testing, this does not necessarily invalidate the data reported by entities for the Testing and Technology Lifecycle activities dimensions. Entities may be testing as standard practice, as reported here, but were unable to pull required data for Conformance dimension questions.

<sup>29</sup> Q24 underwent revision in FY24; some response options are not directly comparable.

- 43% of entities selected engaging users with disabilities in user acceptance testing, compared to 12% in FY23.

Furthermore, entities reported increasing the frequency of integrating Section 508 reviews into electronic content prior to publication, with the majority of respondents or 66% regularly, frequently, or almost always integrating Section 508 reviews, compared to only 44% in FY23. Only 31% of entities reported they sometimes or never integrate Section 508 reviews, a substantial improvement from 52% in FY23 resulting in a 40% improvement YOY. This difference indicates a moderate, meaningful increase in the integration of Section 508 reviews prior to publication (WRST: extremely statistically significant). Investments in maturing the technology lifecycle is also reflected in the frequency in which reporting entities utilize a process or plan for creating accessible agency official communication, with 46% of respondents selecting they regularly, frequently, or almost always utilize said plan, up from 44% in FY23, indicating a small, meaningful increase (WRST: extremely statistically significant).

Entities also reported on how often public, online documents are tested for Section 508 conformance prior to distribution. In FY23, half of the reporting entities indicated they regularly test electronic documents prior to posting. This improved in FY24 by a small, meaningful increase (WRST: extremely statistically significant), with half of the reporting entities now testing frequently, which happens approximately 60%-89% of the time. Furthermore, 51% of entities reported frequently or almost always testing documents prior to distribution, with entities still reporting additional bandwidth to perform more comprehensive electronic document testing than web page testing.

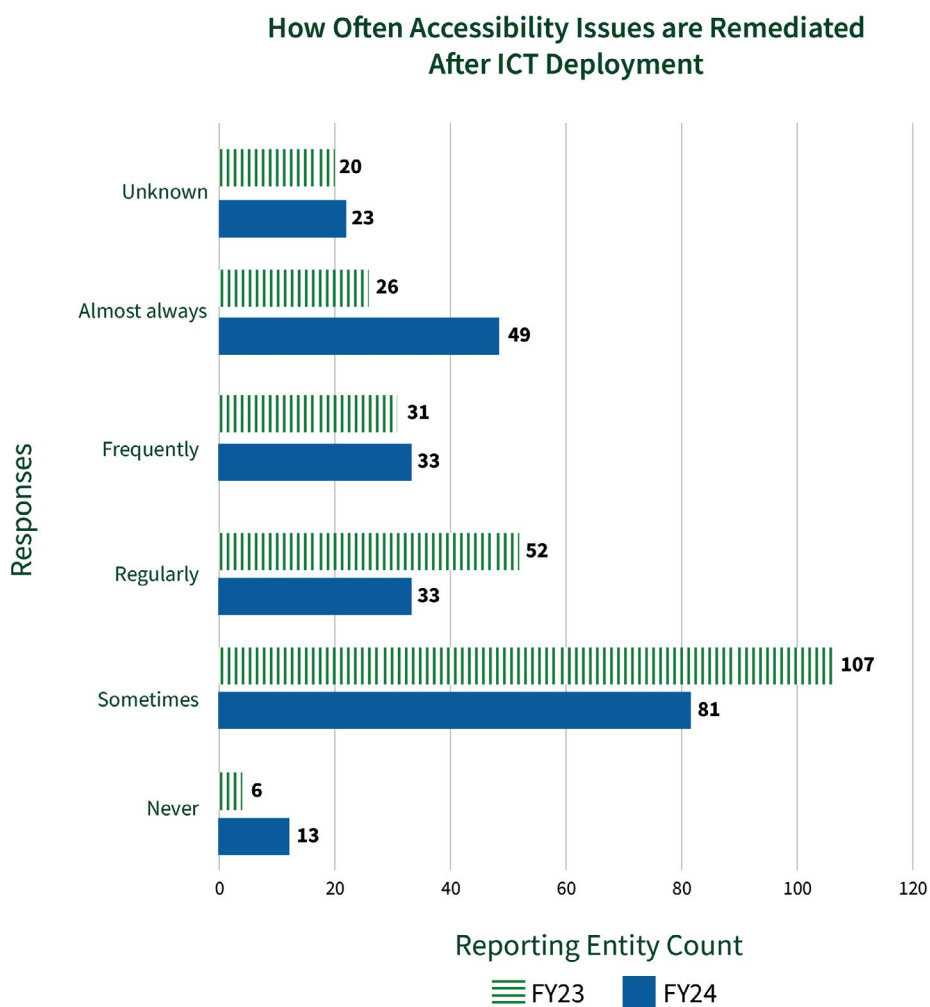
## Nonconformance Tracking and Remediation

Agencies across the federal government are still procuring, using, maintaining, and developing inaccessible ICT as demonstrated by low conformance in [Compliance Key Findings](#). As detailed in the previous section, testing methods for reporting entities have improved, however leadership decisions regarding the tracking and remediation of defects are also crucial for improving ICT conformance.

The Assessment continued to ask how the reporting entity escalates and takes action on nonconformance issues with vendors or contractors who produce or deliver inaccessible ICT despite contractual requirements. Thirty-six percent (36%) of reporting entities escalate or take actions on inaccessible products and deliverables less than 24% of the time. However, there is a 33% decrease in the number of entities who never take action resulting in an improvement from 9% in FY23 to 6% in FY24. **Reporting entities also increased how frequently they take actions to enforce digital accessibility**, with 40% of entities regularly, frequently, or almost always taking actions to escalate and enforce compliance in FY24 compared to 33% in FY23, resulting in a 21% increase.

Furthermore, the Assessment asked how entities remediate nonconformant ICT that is deployed or distributed, with **35% of entities sometimes or never taking action for remediation, down from 48% in FY23**. This difference indicates a moderate, meaningful increase (WRST: extremely statistically significant) to improve the remediation efforts of nonconformance issues. As Figure 18 shows, 20% almost always immediately remediate high-severity issues, an improvement from 10% in FY23, leading to an 88% increase. Reporting entities are making investments in their remediation efforts that may be more evident in conformance outcomes in future years.

**Figure 18: YOY response count comparison of how known nonconformance issues are remediated after deployment or distribution of ICT (Q56)**



Additional technology lifecycle findings show:

- In FY24, the **majority of respondents or 52% reported regularly, frequently, or almost always track and remediate digital content**, whereas last year, the majority or 51% did not. Furthermore, the YOY difference indicates a small, meaningful increase (WRST: extremely statistically significant). In FY24, a little under half of all respondents or 42% reported they do

not track nonconformant digital content, or they do track but only sometimes take action to remediate, leading to a 17.6% decrease.

- Respondents noted a **58% increase in the number of respondents who** engage in technology lifecycle activities and **do not or only sometimes assess risk of Section 508 nonconformant ICT throughout the technology development lifecycle**. Forty percent (40%) of respondents selected this response in FY23 with 63% of entities selecting this option in FY24.<sup>30</sup> Assessment data does not detail why these specific response options increased, but it may be due to more accurate reporting in FY24.

Many respondents reported focusing on enhancing digital accessibility throughout the technology lifecycle and advancing their testing practices. However, the differing accounts of successes and challenges highlight the varying levels of maturity among reporting entities. Some specific actions include:

- Embedding Section 508 more thoroughly into the procurement process, which includes more reviews, accountability for vendors, and considering the needs of PWD.
- Improving ICT testing through training, thorough hybrid testing, and increasing the amount of test reports by Trusted Testers.
- Enhancing the thoroughness of accessibility testing and ensuring effective remediation of identified issues.
- Establishing an ICT conformance reporting portal to collect and review Section 508 testing and conformance documentation.
- Integrating best practices throughout the technology lifecycle and providing guidance earlier in the process in order to avoid costly remediation.
- Developing a targeted engagement approach with product line and portfolio managers to prioritize Section 508 in the technology lifecycle.
- Gaining traction with development teams to integrate Section 508 testing early in the technology lifecycle.
- Focusing on testing applications for conformance as part of the integration with the security authority to operate (ATO) process.

Respondents still noted numerous challenges: varied commitment to accessibility across programs, accessibility still being treated as an afterthought, digital accessibility conformance not being part of the technology lifecycle, limited or no testing tools, and lack of testing personnel.

Overall, Section 508 testing and its integration into the technology lifecycle has improved over the past year. The majority of reporting entities now use a combination of automated and manual tools to test comprehensively. However, inadequate or absent consideration of Section 508 at the early

<sup>30</sup> Sixteen (16) reporting entities or 6% noted they do not engage in technology lifecycle activities and were removed from the calculation of overall percentage.

stages of the ICT lifecycle remains a significant challenge. Approximately 41% of respondents report they sometimes or never integrate Section 508 conformance into technology lifecycle activities, or are unsure how often it occurs.

Despite this, entities reported increasingly conducting testing on web content and integrating Section 508 reviews into electronic content prior to publication. The majority of respondents now regularly, frequently, or almost always incorporate Section 508 reviews. Additionally, entities are taking more frequent actions to enforce digital accessibility, with 40% of respondents reporting they regularly, frequently, or almost always escalate and enforce Section 508 conformance in FY24. Investments in enhancing Section 508 testing, prioritizing remediation, and embedding Section 508 considerations into the technology lifecycle are positive steps that should lead to improved ICT conformance in the coming years.

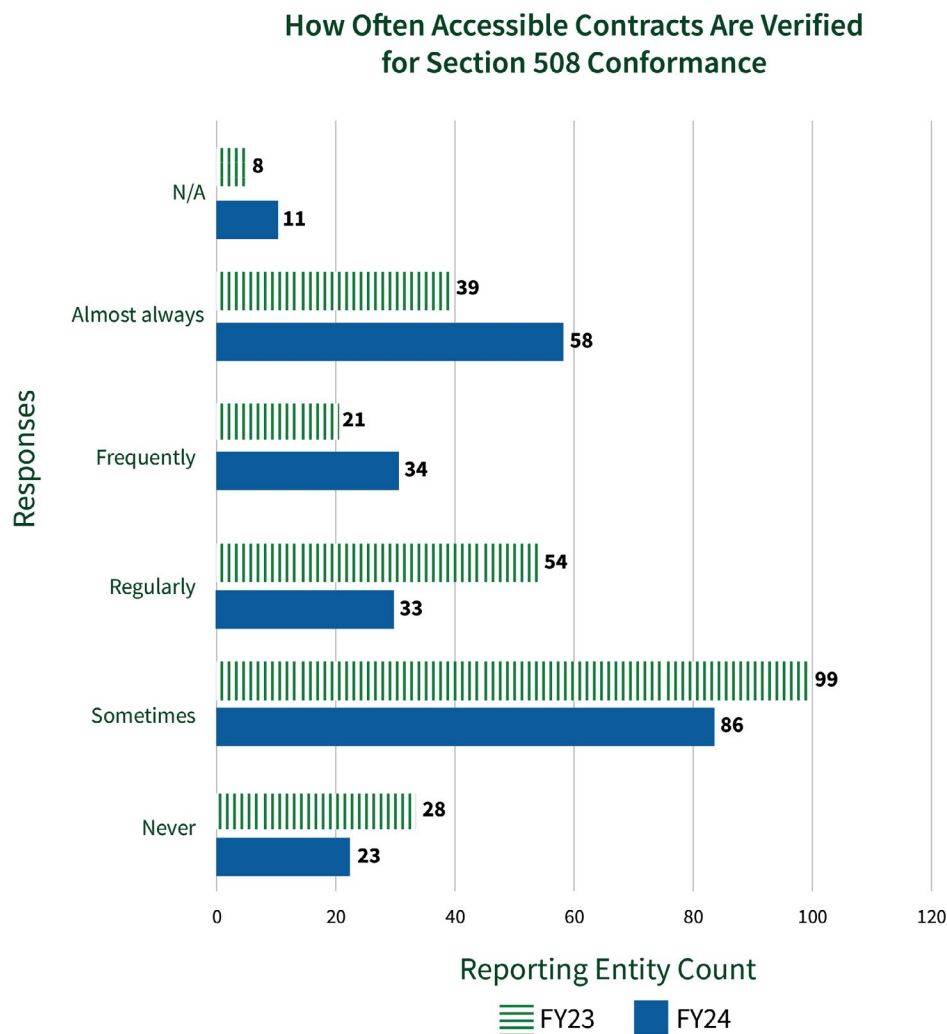
## Acquisition and Procurement

Incorporating digital accessibility requirements into procurement processes and holding vendors accountable for meeting these requirements helps the government comply with Section 508 for all ICT it buys, builds, maintains or uses. **In general, while entities have made YOY improvements, they have not fully integrated Section 508 considerations in the acquisition phase, which may limit the positive downstream impacts on the accessibility of the ICT they procure and use.**

Of the 239 entities who release solicitations, 171 entities or 71.5% reported ICT accessibility requirements are regularly, frequently, or almost always included in solicitations, compared to 73% in FY23. While we see a small decline in percentage including sufficient accessibility requirements, there were more entities in FY24 who released solicitations and more solicitations that included ICT accessibility requirements. The YOY difference indicates a small, meaningful increase (WRST: extremely statistically significant) with now half of the reporting entities indicating they almost always – 90% or more of the time – include sufficient ICT accessibility requirements in solicitations.

Similar to last year, we still see a varied approach to verifying contract deliverables that are required to be Section 508 conformant. There was a reported increase this year in the number of entities who almost always verify digital accessibility requirements prior to acceptance, with 58 entities or 23.7% compared to 39 entities or 16% in FY23 selecting this response. However, 109 entities, or 46.6%, sometimes or never verify the accessibility of contract deliverables. **While this is a slight decrease compared to FY23** when 53% of entities reported an inconsistent verification approach, **this is still a very high percentage of entities who are accepting contract deliverables without knowing if they meet the contractual requirements for digital accessibility.** Figure 19 depicts the full breakdown of responses and comparison with FY23.

**Figure 19: YOY comparison of response count of approaches to verifying contract deliverables (Q60)**



Of the 205 reporting entities that release solicitations, 127 entities (62%) knew how many of their last 10 solicitations to procure ICT and services to produce ICT included all applicable Section 508 requirements, compared to only 39% last year.<sup>31</sup> Seventy-eight (78) entities (38%) did not know this data compared to 44% of entities last year. This could have been due to lack of insight into the acquisition side of the reporting entity, lack of awareness as to where to find the necessary documentation, or lack of resources. However, we do see a positive shift in respondents knowing this data which may suggest entities are improving their processes and tracking of ICT acquisitions. Of the solicitations released:

- 12 entities (8%) reported none of their ICT solicitations included all applicable Section 508 requirements. There is increased risk that entities are procuring products and services that

<sup>31</sup> Q57 and Q99 both ask about the inclusion of sufficient ICT requirements in solicitations. [Data validation](#) checks found a discrepancy in the number of entities who reported they don't release solicitations in Q57 (6 entities) and in Q99 (40 entities).

may be inaccessible and may remain inaccessible due to contractual omissions. This also risks noncompliance with Federal Acquisition Regulation (FAR) section 11.002(f) and subpart 39.2, which ensures Section 508 standards are considered in acquisition planning documents and procurement requirements for ICT and that deliverables meet accessibility standards.

- 90 reporting entities reported between 81%-100% of their solicitations included all applicable Section 508 requirements (compared to 72 entities in FY23), with an overwhelming majority (80 entities or 63%) reporting 100% conformance (compared to 66 entities in FY23).

**Despite the improvement, over a quarter of reporting entities continue to report they do not know if their ICT solicitations include all applicable requirements.** With readily available tools, such as the [Accessibility Requirements Tool \(ART\)](#), to ensure adequate digital accessibility language is included in all relevant solicitations, there is no justification for the ongoing release of solicitations without accountability for digital accessibility.

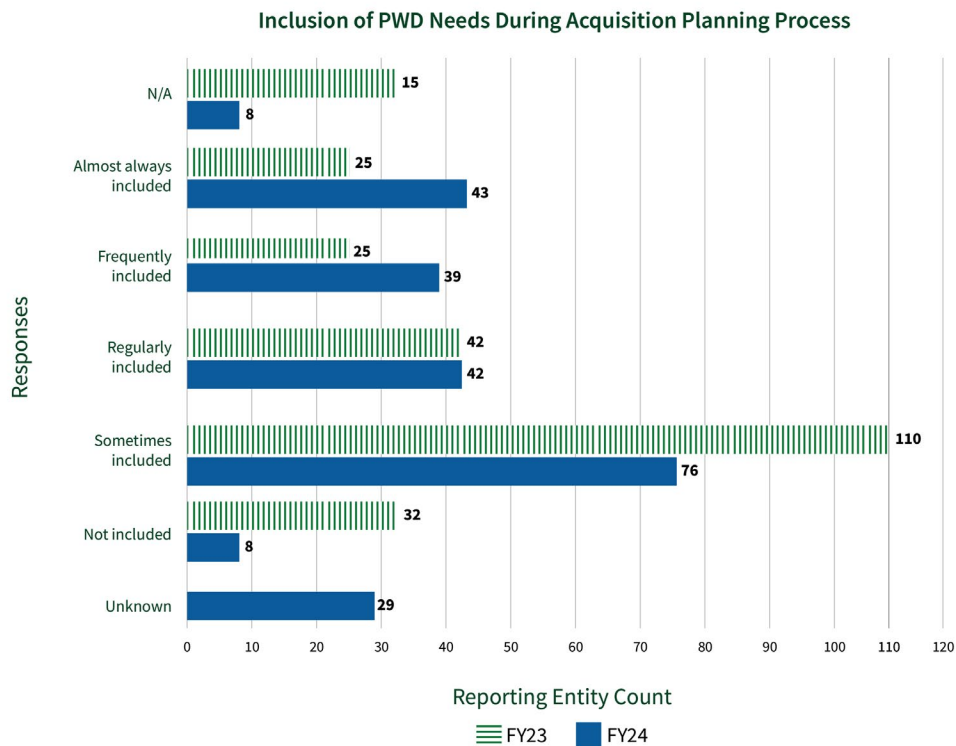
The Assessment asked a new question this year to better understand how reporting entities research and evaluate contractors in order to select the most capable of delivering ICT development services that meet applicable Section 508 requirements. Entities selected all that apply and the results found:

- 47 entities do not research or evaluate contractors.
- 83 entities interview potential vendors.
- 115 entities review past performances.
- 137 entities review contractor capability statements.
- 72 entities request and review vendor ICT samples for Section 508 conformance.
- 92 entities have a Section 508 Subject Matter Expert review contractor submitted solicitations or equivalent.
- 41 entities selected “other” for actions such as reviewing Accessibility Conformance Reports (ACRs), testing ICT, and ensuring inclusion of Section 508 in the technical evaluation.

Following a FY23 Assessment recommendation for entities to increase inclusion of users with disabilities throughout the technology lifecycle, criteria continued to survey how the needs of individuals with disabilities are included during assessment of ICT-related business needs or equivalent acquisition planning process. The responses indicate a moderate, meaningful YOY increase (WRST: extremely statistically significant) and showed improvement with 75% fewer entities reporting that needs are not considered and almost 22% fewer entities noted that needs are sometimes considered but generally on an ad hoc basis. In addition, **56% more entities noted that needs are frequently considered and 72% more entities reported that needs are integrated into the business process and are almost always included.**



**Figure 20: YOY comparison of percentage of responses for inclusion of PWD during the assessment of ICT-related business needs or equivalent acquisition planning process (Q61)**



Additional Acquisitions and Procurement highlights include:

- 50% of respondents regularly, frequently, or almost always obtain ACRs for all products and consideration for Section 508 conformance is a formal part of review during the market research phase for ICT products.
- 46% of respondents regularly, frequently, or almost always include Section 508 in the technical evaluation of proposals related to ICT services and products. Comparatively, 43% never or only sometimes include Section 508 in the technical evaluation. The YOY difference indicates a small, meaningful increase (WRST: extremely statistically significant), with half of the reporting entities in FY24 now indicating they regularly include Section 508 in the technical evaluation of proposals, which is approximately 25%-59% of the time.



Many reporting entities highlighted advancements in acquisitions and procurement over the past year, including:

- Formal attention to Section 508 during planning and acquisition.
- Leading efforts to integrate Section 508 familiarization and compliance criteria through stakeholder engagement, targeted personnel, and working groups.
- Increasing awareness of Section 508 compliance by increasing frequency of training and focusing on IT acquisition and government purchase card holders.
- Updating acquisition policy with new Section 508 language.
- Requiring Section 508 language in all solicitations.
- Modifying internal acquisition processes, including updating manuals, creating playbooks, and updating or creating policies and procedures to integrate Section 508 as a key factor in procurement.
- Requiring the Section 508 program to assess all ICT procurements exceeding \$100,000 as part of a new manual review process.
- Promoting the use of ART.
- Involving the Section 508 Program Manager in market research for new acquisitions.
- Requiring approved Section 508 documentation, such as a Section 508 Acquisition Checklist.
- Standardization and implementation of Voluntary Product Accessibility Template (VPAT®) or ACR analysis for ICT procurements.

However challenges remain, such as:

- Lack of or inadequate knowledge by acquisition officials regarding digital accessibility.
- Section 508 validation of procured ICT prior to acceptance or implementation.
- Persistent gaps in the ICT acquisition process.
- Difficulty in conformance monitoring throughout the acquisition lifecycle.
- General resistance to Section 508 compliance.

While entities made notable progress in integrating Section 508 considerations into ICT acquisitions, they still face challenges. In FY24, respondents increased verification of Section 508 conformance in contract deliverables prior to acceptance, and showed greater awareness of Section 508 requirements in their ICT solicitations. However, over a quarter of reporting entities still do not know whether their solicitations meet applicable Section 508 requirements. They also struggle with knowledge gaps among acquisition officials, inconsistent validation practices, and challenges in monitoring conformance throughout the procurement lifecycle. Entities should tackle these issues more effectively, as Section 508 compliance begins in the acquisition phase.

## Exceptions

This year's Assessment expanded the questions regarding Section 508 exceptions to include the total number of exceptions issued within the reporting period, if the reporting entity has a defined process for reviewing and approving three specific exceptions, and who has authority to sign off on exceptions.<sup>32</sup>

This year's data shows a substantial reduction in the number of exceptions issued overall. While data does not reveal specifically why, it may be that entities misreported last year or had more accurate reporting this year. Additional explanations from reporting entities note:

- Some Section 508 programs developed or improved their framework for Section 508 exception requests. This includes clarifying the role of the Section 508 PM as the sole decision-maker on all exception requests, establishing a standard operating procedure (SOP) for exceptions and establishing a formalized process to review and adjudicate all Section 508 exception requests through the IT Governance process.
- One entity implemented a robust Section 508 compliance process for software designed to discourage exceptions to Section 508 compliance by disallowing blanket exceptions and requiring any exception to be justified and signed off on by both the Section 508 PM and the Associate Chief Information Officer. The impact has been a marked reduction in the use of exceptions for Section 508 compliance, such that there have been no exceptions granted for Section 508 since the process has been put into place.
- Another entity noted implementing a new process in the acquisition and procurement process for identifying ICT purchases that allows the Section 508 PM to oversee all exceptions requests, including reviewing and approving exceptions. Prior to the implementation of this updated form, there was no oversight for claiming exceptions.

When asked if each reporting entity had a process for approving Fundamental Alteration and Undue Burden exceptions, 117 entities (48%) said yes, 78 entities (32%) said no, 43 entities (18%) did not know, and 7 entities said exceptions are not applicable to their business functions.

Additionally, 19 entities noted they did not require any sign off on these exceptions. When asked if each reporting entity had a process for approving Best Meets exceptions, 112 entities (46%) said yes, 82 entities (33%) said no, 39 entities (16%) did not know, and 12 entities selected that exceptions are Not Applicable to their business functions. Additionally, 22 entities noted they did not require any sign off on these exceptions. Please see Table 12 for a response count of who has authority to sign off on exceptions within reporting entities.

<sup>32</sup> Three Section 508 exceptions require documentation, including a plan to ensure people with disabilities can access and use ICT by an alternative means that meets their needs: Fundamental Alteration [36 CFR 1194 E202.6], Undue Burden [36 CFR 1194 E202.6], and Best Meets [36 CFR 1194 E202.7].

**Table 12: Response count for who has authority to sign off on specific exceptions. Entities selected all that apply.**

<b>Authority</b>	<b>Best Meets Exceptions</b>	<b>Undue Burden/ Fundamental Alteration</b>
<b>Section 508 Project Manager</b>	101	85
<b>Contracting Officer's Technical Representative (COTR) or Contracting Officer's Representative (COR)</b>	25	22
<b>Contracting Officers</b>	30	27
<b>CIO or designee</b>	99	106
<b>Chief Acquisition or designee</b>	15	13
<b>Sign off is not required</b>	22	19
<b>Other</b>	56	73

Further analysis on the three types of exceptions covered in the Assessment shows roughly 30% of entities did not know how many exceptions were approved within any category and significantly more Best Meets exceptions were issued than any other exception. Further breakdown of these exceptions is below.

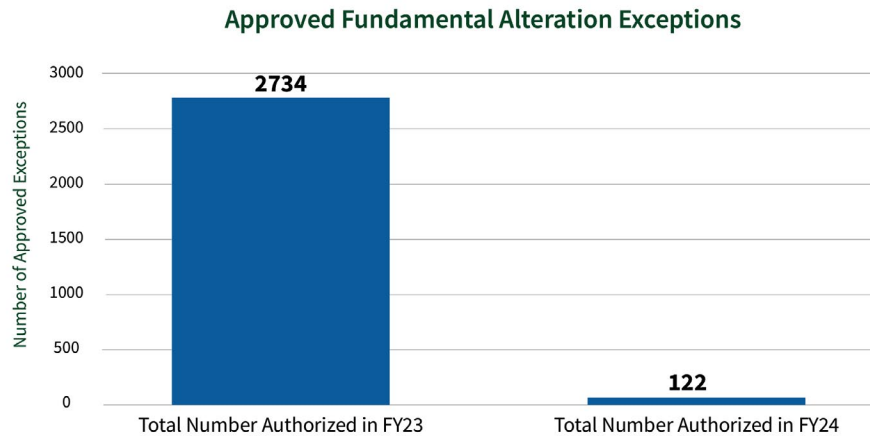
#### Fundamental Alterations

- 79 entities (32%) did not know how many exceptions they had that fell into this category compared to 41% last year.
- A total of 122 fundamental alteration exceptions were issued this year compared to 2,734 reported in FY23, leading to a 96% decrease YOY.<sup>33</sup>
- The highest number of exceptions issued for a single entity was 27, compared to 2,674 in FY23.<sup>34</sup>
- Of entities who used this exception, the average was 8 fundamental alteration exceptions approved in FY24.

<sup>33</sup> We do not have enough information to know if the FY23 data was incorrectly reported, which could account for this significant decrease YOY.

<sup>34</sup> We do not have enough information to know if the FY23 data was incorrectly reported, which could account for this significant decrease YOY.

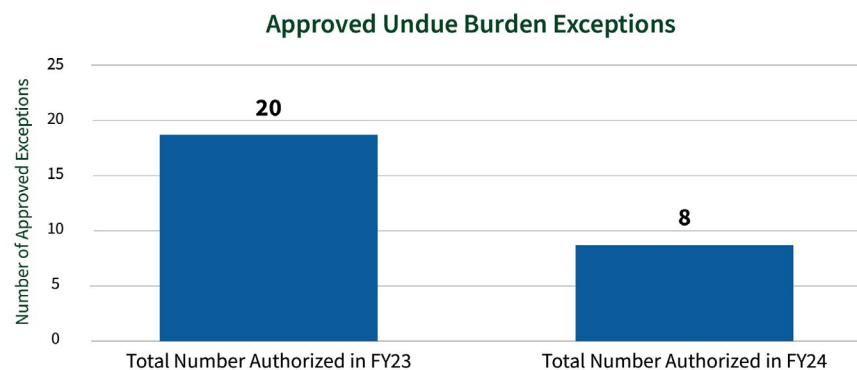
**Figure 21: Comparison of total approved Fundamental Alteration Exceptions**



**Undue Burden:**

- 76 entities (31%) did not know how many exceptions they had that fell into this category compared to 39% last year.
- A total of 8 exceptions were issued this year compared to 20 in FY23, leading to a 60% decrease YOY, which indicates a small, meaningful decrease (WRST: extremely statistically significant).
- The highest number of exceptions issued for a single entity was 3 compared to 8 in FY23.
- Of entities who used this exception, the average was 1.6 Undue Burden exceptions approved in FY24.

**Figure 22: Comparison of total approved Undue Burden Exceptions**

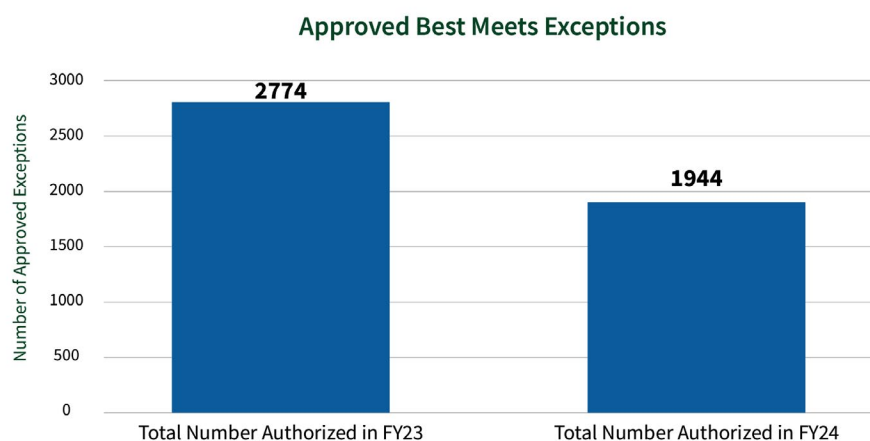


**Best Meets:**

- 79 entities (32%) did not know how many exceptions they had that fell into this category compared to 41% last year.
- A total of 1944 exceptions were issued in FY24 compared to 2774 in FY23, leading to a 30% decrease YOY.
- The highest number of exceptions issued for a single entity was 679 compared to 1000 in FY23.

- Of the entities who used this exception, the average was 57 Best Meets exceptions approved in FY24.

**Figure 23: Comparison of total approved Best Meets Exceptions**



As findings show in Compliance Key Findings, a large percentage of commercially-available ICT still does not fully conform to Section 508 but nonetheless is frequently procured. Because of this, we anticipate Best Meets authorizations are – and will continue to be – used frequently in procurement. While this year’s Assessment asked for more data on exceptions, we still do not have enough information to know if exceptions are accurately authorized or if the current data suggests an underreporting or underutilization of exceptions. Despite that, the number of exceptions approved by entities dropped significantly this year. Numerous entities noted investments in their exceptions process within acquisitions to include stricter guidelines and a more formal approval process over the past year.

## Complaints

Under Section 508 of the Rehabilitation Act (29 U.S.C. § 794d(f)(2)), the agency receiving the complaint shall apply the complaint procedures established to implement section 504 for resolving allegations of discrimination in a federally conducted program or activity. OMB’s M-24-08 also required agencies to include instructions for filing a complaint alleging a violation of Section 508 in their website’s digital accessibility statement.

Please note that the terms “reporting entity” and “respondent” are not synonymous with “agencies” as used in M-24-08. Components are not required to implement M-24-08 independently from their parent agency, so may not have their own complaints process.

**FY24 Assessment data shows an increase in entities providing instructions on filing Section**

**508-related complaints.** One hundred eighty-eight (188) entities (77%) reported providing instructions for filing a complaint alleging a violation of Section 508 in their accessibility statement, compared to 131 entities (53%) in FY23. However, only 152 entities reported having a process for tracking and reporting Section 508 noncompliance-related complaints, with 123 of those entities also incorporating complaints from contractors into that process. In FY23, 110 reporting entities (44%) said they lack formal, written policies and procedures for processing and resolving complaints filed in relation to Section 508 nonconformance issues. In FY24, the number of entities increased to 127 entities (52%), with **a 57% YOY increase in entities who reported managing complaints on an ad hoc basis but with plans to establish a documented process.**

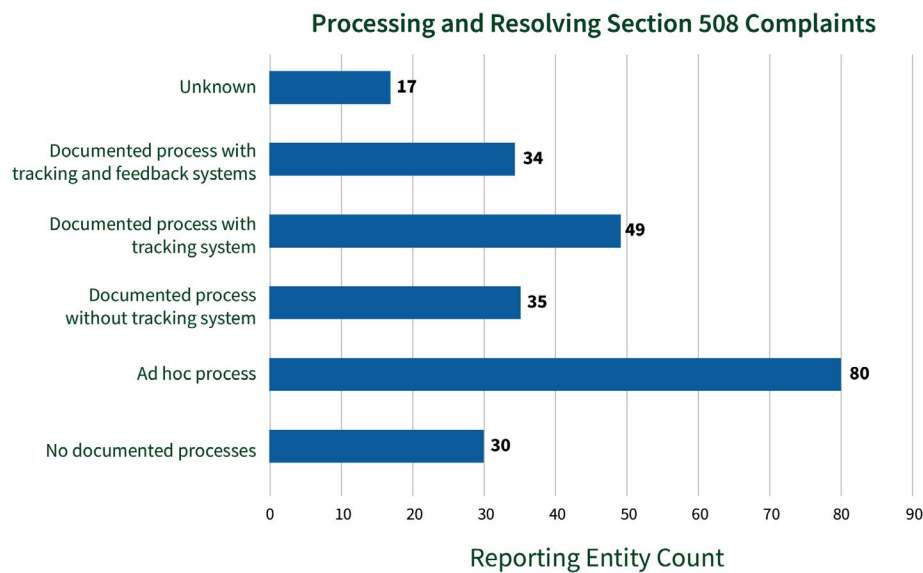
As shown in Figure 24, entities were asked to indicate to what extent the reporting entity has documented processes and procedures for how Section 508 complaints are reported, assessed, tracked, and resolved<sup>35</sup>:

- 30 entities (12%) reported no documented processes or procedures.
- 80 entities (33%) reported managing complaints on an ad hoc basis and has a plan to establish documented policies and procedures.
- 35 entities (14%) reported implementing a documented complaint process with specific procedures but lacks systematic tracking.
- 49 entities (20%) reported implementing a documented complaint process with specific procedures with systematic tracking.
- 34 entities (14%) reported implementing a documented complaint process with specific procedures with systematic tracking and feedback loops for continuous improvement.
- 17 entities (7%) selected unknown.

---

<sup>35</sup> A similar question was asked in the FY23 Assessment, but due to response edits in FY24, answers did not align for YOY comparison for all response options.

**Figure 24: FY24 response count of formal, written policies and procedures for processing and resolving complaints filed in relation to Section 508 nonconformance issues (Q36)**



One hundred seventy (170) entities (69%) knew how many complaints were received within the reporting period. **Overall, there was a decrease in the number of entities that did not know how many complaints they received over the reporting period, falling from 100 in FY23 to 75 in FY24.** YOY saw similar numbers of entities who received complaints, with 31 entities reporting complaints in FY23 compared to 32 entities in FY24. Of those:

- 32 entities had at least one complaint totaling 123 complaints across those 32 reporting entities compared to 201 complaints received in FY23. The highest complaint total for an entity was 28 compared to 66 in FY23.
- 138 entities reported receiving zero complaints.
- Of the complaints filed in the reporting period, 86 were from employees or applicants for employment across 21 entities.
- Of the total number of Section 508 noncompliance-related complaints received during the reporting period, 92 complaints (75%) were resolved, compared to 162 or (80.5%) in FY23, leading to a small, meaningful decrease (WRST: highly statistically significant) in resolution status. Nineteen (19) entities fully resolved all complaints compared to 17 in FY23, while 6 entities resolved none compared to 4 in FY23, and 7 entities resolved between 30% to 86% of their complaints. On average, there was a decrease of almost 4 complaints that were addressed, resolved, or adjudicated from FY23 to FY24.

Reporting entities still noted challenges related to Section 508 complaints, including confusion on where responsibility for Section 508 complaints lies within their reporting entity and requesting more guidance on the Section 508 complaints processes and related procedures. However, entities noted improvements, with one entity stating one of the top areas they focused on since FY23 was complaint management. Numerous entities described making the following changes to complaints management in the past year:

- Establishing processes and procedures for complaints.
- Developing and implementing a complaint management system to efficiently address and resolve accessibility issues reported by users.
- Taking steps to enhance feedback and complaints processes and tracking using a customer relationship management tool.
- Establishing SOPs for items in the program that have a gap such as administrative complaints.
- Focusing on better usability and accessibility of digital resources, which led to a reduced number of accessibility-related complaints and issues reported.
- Creating a Section 508 page for their intranet that included instructions for filing a Section 508 complaint.
- Updating their accessibility statement, allowing users to more easily find points of contact for complaints and accessibility issues.

Entities in FY24 noted a 44% increase in providing instructions on how to file complaints alleging a Section 508 violation. However, there was a decrease in entities who have processes, procedures and policies for tracking complaints. This year, there was a similar number of entities reporting a complaint, with a slight increase in the overall number of entities who knew how many complaints they received. There is still work to be done to ensure repeatable procedures for processing and tracking complaints are implemented. It's essential for agencies to keep thorough records of Section 508-related complaints as this documentation provides valuable insights into the volume of complaints and specific issues raised. With this information, Section 508 program offices can enhance their training and support initiatives and allocate resources more effectively to improve compliance.



# Category-level Findings and Recommendations

As previously mentioned, categories are composed of the maturity and conformance index pairs, such as High Maturity High Conformance (High-High), Low Maturity High Conformance (Low-High), etc. In total, there are 25 categories that include all the combinations of the two scales that range from Very Low to Very High for both Maturity and Conformance as explained in the section discussing [Assessment Indices and Reporting Entity Scatter Plot](#).

Below is a summation of outcomes and recommendations by category.

## Very Low-Very Low

- Number of Entities in Category: 20
- Average Maturity Score: 0.49
- Average Conformance Score: 0.47
- Two Lowest Average Dimensions: Human Capital, Culture, and Leadership (0.31), Testing and Validation (0.45)
- Two Highest Average Maturity Scores: Communications (0.77) and IT Accessibility Program Office (0.70)

## Highlighted Outcomes:

- 15 entities (75%) said they did not have the resources to test for accessible videos.
- 17 entities (85%) said their Section 508 policy is either in draft (5 entities, 25%), does not exist (10 entities, 50%) or is unknown to exist (2 entities, 10%). Only 3 entities (15%) in this category said they had a published Section 508 or ICT accessibility policy, but did not include all relevant M-24-08 and Section 508 statutory requirements. No respondents picked the top 2 responses for this question.
- Entities performed well relative to others in the Very Low Maturity bracket in Policies, Procedures, and Practices, but somewhat behind the trend in the Acquisitions and Procurement.

## Summary

Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.

## Very Low-Low

- Number of entities in Category: 7
- Average Maturity Score: 0.75
- Average Conformance Score: 1.34
- Two Lowest Average Dimensions: Training (0.31), IT Accessibility Program Office (0.45)
- Two Highest Average Maturity Scores: Acquisition and Procurement (1.13) and Content Creation (1.07)

### Highlighted Outcomes:

- 7 entities (100%) either had no established Section 508 Program or equivalent (6 entities, 86%) or only had one in development and it was not yet a formalized program (1 entity 14%). No reporting entity in this category had an established Section 508 Program or equivalent.
- 5 entities (approximately 70%) said they did not have resources to test for the accessibility of their electronic documents.
- Entities in this category performed better than others in the Very Low Maturity bracket in Content Creation and Human Capital, Culture, and Leadership dimensions, while performing under trend in the IT Accessibility Program Office Dimension.

### Summary

Those in the Very Low-Low overall performance category have several areas where they may invest to improve accessibility. However, as no reporting entity in this category had an established Section 508 program, fully establishing a Section 508 program would likely be a significant first step.

## Very Low-Moderate

- Number of entities in Category: 2
- Average Maturity Score: 0.66
- Average Conformance Score: 2.12
- Two Lowest Average Dimensions: Training (0.00), Policies, Procedures and Practices (0.00), and Communications (0.00)
- Two Highest Average Maturity Scores: Acquisition and Procurement (1.67), Technology Lifecycle Activities (1.25), and IT Accessibility Program Office (1.25)

## Highlighted Outcomes:

- 2 entities (100%) said web content either never receives comprehensive Section 508 conformance validation testing – internet and intranet – prior to deployment (1 entity) or that it is unknown if manual testing is done (1 entity).
- One entity said a Section 508 Program or equivalent is in development. The other simply said they do not have a formal Section 508 Program or equivalent.
- Entities in this category performed above trend than others in the Very Low Maturity bracket in Technology Lifecycle Activity and Acquisition and Procurement dimensions, while performing under trend in the Policies, Procedures and Practices, Communications, Content Creation, and Training Dimensions.

## Summary

Those in the Very Low-Moderate overall performance category should invest in establishing a Section 508 Program Office at the entity, as well as establishing a baseline for those activities that are currently not being performed – specifically accessibility-related activities aligned to Training, Communications and Policies, Procedures, and Practices.

## Very Low-High

**There are no reporting entities that fell into the Very Low Maturity-High Conformance Category.**

## Very Low-Very High

**There are no reporting entities that fell into the Very Low Maturity-Very High Conformance Category.**

## Low-Very Low

- Number of Entities in Category: 34
- Average Maturity Score: 1.50
- Average Conformance Score: 0.54
- Two Lowest Average Dimensions: Human Capital, Culture, and Leadership (0.97), Training (1.07)
- Two Highest Average Maturity Scores: Communications (2.17), Content Creation (1.78)

## Highlighted Outcomes:

- 24 entities (71%) said the entity does not have a Section 508 Program or one is in development but not yet established.

- 31 entities (91%) said they did not have the resources to test their top five-viewed videos, while the other three did not have any conformant videos. All entities received a zero for this criteria.
- Entities in this category performed above trend in Communications and Policies, Procedures, and Practices, while being slightly below trend in Testing and Validation.

## Summary

Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.

## Low-Low

- Number of Entities in Category: 15
- Average Maturity Score: 1.47
- Average Conformance Score: 1.31
- Two Lowest Average Dimensions: Human Capital, Culture, and Leadership (0.81), Training (0.85)
- Two Highest Average Maturity Scores: Communications (2.00), Acquisitions and Procurement (1.86)

## Highlighted Outcomes:

- 13 entities (87%) said the entity does not have a Section 508 training plan (12 entities) or it is unknown if they have a plan (1 entity).
- 100% of entities said they either had no resources to test electronic documents (10 entities) or no documents were fully conformant (5 entities).
- Entities in this category performed above trend in Technology Lifecycle Activities Dimension, while being slightly below trend in the IT Accessibility Program Office and Training Dimensions.

## Summary

Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.

## Low-Moderate

- Number of entities in Category: 8
- Average Maturity Score: 1.64

- Average Conformance Score: 2.49
- Two Lowest Average Dimensions: Human Capital, Culture, and Leadership (0.90), Communications (1.33)
- Two Highest Average Maturity Scores: Content Creation (2.51), Testing and Validation (2.37)

## Highlighted Outcomes:

- 7 entities (88%) said the reporting entity does not utilize (1 entity, 13%), utilizes sometimes but in an ad hoc manner (4 entities, 50%), or it is unknown if they utilize a formal process or plan for creating Section 508 conformant agency official communications (2 entities, 25%). The last entity said that it uses a formal process regularly (13%).
- 7 entities (88%) said they escalate and take action on nonconformance issues with vendors and contractors who produce or deliver inaccessible ICT despite contractual requirements for ICT to conform with Section 508 standards only on an ad hoc basis. The other entity answered unknown (13%).
- 75% of reporting entities either do not host videos (5 entities) or the resources they submitted were fully conformant (1 entity). For the other two, 67% of resources were conformant (1 entity), while the final entity had no conformant videos in the top five-viewed videos.
- Entities in this category performed above trend in the Content Creation and Testing and Validation Dimensions while being slightly below trend in the Communications, Technology Lifecycle Activities, and Acquisition and Procurement Dimensions.

## Summary

Those in the Low-Moderate overall performance category should continue to invest in establishing processes for creating accessible communications as well as addressing accessibility in acquisition within the entity.

## Low-High

- Number of Entities in Category: 4
- Average Maturity Score: 1.77
- Average Conformance Score: 3.46
- Two Lowest Average Dimensions: Human Capital, Culture, and Leadership (1.02), Content Creation (1.41)
- Two Highest Average Maturity Scores: Testing and Validation (2.24), Training (1.95)

## Highlighted Outcomes:

- 3 entities (75%) said nonconformant content is only sometimes tracked and remediated within the reporting entity, but generally on an ad hoc basis.
- 3 entities (75%) said they had no Section 508 training plan defined. The final entity said they had a general Section 508 training plan defined but that it does not specify training needs and training curriculum by ICT roles and responsibilities.
- 3 entities (75%) reported that they do not create any surveys. The final entity said the Section 508 conformance of the enterprise-wide survey authoring tool used to create surveys conforms to 50% to 90% of applicable Section 508 requirements.
- All entities said they do not host or produce any videos; similarly 3 entities (75%) said they do not have any publicly-available documents, while the fourth said they did not have resources to test their top 10 documents.
- Entities in this category performed below trend in the Content Creation Dimension while they were more or less aligned with the trend for all other Maturity Dimensions.

## Summary

Those in the Low-High category should invest in improving tracking and remediation of nonconformant content across the enterprise as well as include digital accessibility in Human Capital, Culture, and Leadership efforts, particularly including ICT accessibility into DEIA and mission-related strategic efforts.

## Low-Very High

**There are no reporting entities that fell into the Low Maturity-Very High Conformance Category.**

## Moderate-Very Low

- Number of entities in Category: 13
- Average Maturity Score: 2.37
- Average Conformance Score: 0.55
- Two Lowest Average Dimensions: Human Capital, Culture, and Leadership (1.59), Training (1.95)
- Two Highest Average Maturity Scores: Acquisitions and Procurement (2.95), Content Creation (2.93)

## Highlighted Outcomes:

- 9 entities (69%) said that Section 508 reviews are frequently (2 entities) or almost always (7 entities) integrated into the reporting entity's electronic content prior to publication

- 12 entities (92%) said it is unknown (1 entity), that they never (3 entities), or they only sometimes but usually, in an ad hoc manner, (8 entities) conduct web content user testing with people with disabilities prior to deployment to address all applicable Section 508 standards.
- 10 entities (77%) said they do not have resources to test their top 10 internet pages and 11 entities (85%) said they do not have resources to test their top 10 intranet pages. The others did test for both internet and intranet pages (3 entities and 2 entities, respectively) and all pages were nonconformant.

## Summary

Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.

## Moderate-Low

- Number of Entities in Category: 36
- Average Maturity Score: 2.49
- Average Conformance Score: 1.50
- Two Lowest Average Dimensions: Human Capital, Culture, and Leadership (2.12), Training (2.16)
- Two Highest Average Maturity Scores: Communications (2.96), Policies, Procedures, and Practices (2.69)

## Highlighted Outcomes:

- 29 entities (81%) said that Section 508 reviews only sometimes (17 entities), never (11 entities), or it is unknown (1 entity) if the reporting entity conducts web content user testing with people with disabilities prior to deployment to address all applicable Section 508 standards.
- 21 entities (58%) said their Section 508 program almost always (15 entities), frequently (2 entities), or regularly (4 entities) provides support in response to ICT accessibility-related questions and support requests.
- When asked to test the top 10 documents in the entity, 21 entities (58%) said they either did not have the resources to test (17 entities) or none of the documents they tested fully conformed (4 entities). Another 7 entities (19%) had less than 50% conformance for the documents tested.
- When asked to test the top 10 internet pages in the entity, 24 entities (67%) said they either did not have the resources to test (17 entities) or none of the pages they tested fully conformed (7 entities); another 7 entities (19%) had less than 50% conformance for the pages tested.
- Entities in this category performed below trend in the Technology Lifecycle Activities and Communications Dimensions while they were more or less aligned with the trend for all other Maturity Dimensions.



## Summary

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.

## Moderate-Moderate

- Number of Entities in Category: 16
- Average Maturity Score: 2.50
- Average Conformance Score: 2.44
- Two Lowest Average Dimensions: Technology Lifecycle Activities (1.99), Acquisition and Procurement (2.21)
- Two Highest Average Maturity Scores: IT Accessibility Program Office (3.08), Content Creation (2.73)

## Highlighted Outcomes:

- 12 entities (75%) said they never (2 entities) or only sometimes (10 entities) identify and prioritize risk of Section 508 nonconformant ICT using a risk framework throughout the technology development lifecycle.
- 9 entities (56%) said ICT accessibility core values have been included in the reporting entity DEIA and mission-related strategic plan, and leadership regularly communicates this core value.
- When asked to test the top 10 internet pages in the entity, only 1 entity (6%) said it did not have resources to test. Of the other 94%, 1 did not provide any pages and thus had 0% conformance, 4 other entities (25%) tested pages with no pages fully conforming, and the rest had at least some pages conform with 4 entities (25%) having all pages tested be 100% conformant.
- 88% of entities reported that the Section 508 conformance of the enterprise-wide chat or internal real-time messaging system was either fully conformant (4 entities, 25%), mostly conformant (7 entities, 44%) or the entity did not have such a capability (3 entities, 19%).
- Entities in this category performed below trend in the Technology Lifecycle Activities Dimension and slightly above trend in the IT Accessibility Program Office Dimension.

## Summary

Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.

## Moderate-High

- Number of Entities in Category: 9
- Average Maturity Score: 2.53
- Average Conformance Score: 3.35
- Two Lowest Average Dimensions: Human Capital, Culture, and Leadership (1.84), Training (1.98)
- Two Highest Average Maturity Scores: Acquisition and Procurement (2.92), IT Accessibility Program Office (2.86)

### Highlighted Outcomes:

- 6 entities (67%) said they only sometimes verify contract deliverables that are required to be Section 508 conformant.
- 5 entities (55%) said they had no Section 508 training plan defined, while 2 entities (22%) stated they have a general Section 508 training plan defined but do not specify training needs and training curriculum by ICT roles and responsibilities. The last 2 entities (22%) said they have a Section 508 training plan that identifies training needs and training curriculum for some ICT roles and responsibilities
- 8 entities (89%) said they either did not host or produce any videos (4 entities, 44%), or they had the resources to test their top 5 videos (4 entities, 44%) with 3 of those that tested reporting 100% conformance for those videos; only one entity (11%) said they did not have the resources to test.
- 78% of entities reported they either do not have any publicly posted Section 508 and ICT accessibility policies (1 entity) or their policy conforms to all relevant Section 508 conformance standards (67%, 6 entities). The other two (2 entities, 22%) reported 50% to 90% of applicable Section 508 requirements.
- Entities in this category performed below trend in the Communications and Human Capital, Culture, and Leadership Dimensions and slightly above trend in the Acquisition and Procurement Dimension.

### Summary

Although overall performing moderately well in the Acquisition and Procurement maturity dimension, those in the Moderate-High overall performance category should continue to develop capabilities to verify the accessibility of contract deliverables as well as improving their Section 508 training planning and capabilities.

## Moderate-Very High

- Number of Entities in Category: 2
- Average Maturity Score: 2.12
- Average Conformance Score: 4.32
- Two Lowest Average Dimensions: Human Capital, Culture, and Leadership (0.94), Acquisition and Procurement (1.15)
- Two Highest Average Maturity Scores: Content Creation (4.69), Communications (2.97)

### Highlighted Outcomes:

- All entities said ICT accessibility is not included in any reporting entity policies or directives.
- 1 entity (50%) said there are no documented processes or procedures for reporting, assessing, tracking, and resolving Section 508-related complaints. The other entity said it was unknown if they have a process for complaint resolution.
- All entities said both their enterprise-wide chat or internal real-time messaging system and their enterprise-wide Learning Management System (LMS) were both 100% conformant to applicable ICT accessibility standards.
- Both reporting entities tested all 10 of the requested top 10 viewed documents and determined all were 100% conformant to relevant Section 508 standards.
- Entities in this category performed well below trend in the Human Capital, Culture, and Leadership and the Acquisition and Procurement Dimensions and well above trend in only one dimension: Content Creation. In fact, almost all of the dimensions, except Content Creation, were somewhat below or well below trend (this content is buoying all other Dimension outcomes.)

### Summary

Given such high and consistent conformance, those in the Moderate-Very High overall performance category should allocate resources into building lasting efforts related to ICT accessibility across the enterprise, specifically by maturing their Section 508 program and entity-wide accessibility efforts.

## High-Very Low

- Number of Entities in Category: 10
- Average Maturity Score: 3.43
- Average Conformance Score: 0.79

- Two Lowest Average Dimensions: Testing and Validation (2.96), Policies, Procedures, and Practices (3.21)
- Two Highest Average Maturity Scores: Content Creation (4.00), IT Accessibility Program Office (3.83)

## Highlighted Outcomes:

- 8 entities (80%) reported that Section 508 is almost always included in the ICT governance processes such as milestone reviews, publication or deployment decisions, and change control reviews.
- 8 entities (80%) reported the entity's Section 508 or ICT accessibility policy is only in draft. Only two entities (20%) had a published Section 508 or ICT accessibility policy.
- 9 entities (90%) said they did not have resources to test their top 10 publicly available internet pages.
- 9 entities (90%) said they did not have resources to test their top 10 internal intranet pages as well as their top 10 viewed publicly available documents.
- Entities in this category performed slightly below trend in the Acquisition and Procurement Dimension and above trend in the Content Creation and Human Capital, Culture, and Leadership Dimensions.

## Summary

Given relatively high maturity outcomes and a preponderance of responses stating they do not have resources to test for conformance, those in the High-Very Low overall performance category should consider dedicating significant resources to developing testing processes and capabilities and focusing on testing and remediation to improve conformance outcomes.

## High-Low

- Number of entities in Category: 24
- Average Maturity Score: 3.50
- Average Conformance Score: 1.55
- Two Lowest Average Dimensions: Human Capital, Culture, and Leadership (3.10), Communications (3.20)
- Two Highest Average Maturity Scores: IT Accessibility Program Office (4.01), IT Acquisition and Procurement (3.82)

## Highlighted Outcomes:

- 20 entities (87%) reported that Section 508 is almost always included in the ICT governance processes such as milestone reviews, publication or deployment decisions, and change control reviews.
- 13 entities (54%) reported they only sometimes perform comprehensive manual Section 508 conformance validation testing on reporting entity web content – internet and intranet – prior to deployment but generally on an ad hoc basis.
- 16 entities (67%) reported they never (2 entities) or only sometimes but generally on an ad hoc basis (14 entities) conduct web content user testing with people with disabilities prior to deployment to address all applicable Section 508 standards.
- 22 entities (92%) reported they either did not have resources to test their top 10 publicly available internet pages (16 entities, 67%) or that they did test and no pages were fully conformant (6 entities, 25%). The last two entities (8%) each reported only 10% conformance for the pages they tested.
- 22 entities (92%) reported they either did not have resources to test their top 10 publicly available internet pages (17 entities, 71%) or that they did test and no pages were fully conformant (5 entities, 21%). The last two entities (8%) each reported 100% conformance for the pages tested.
- Entities in this category performed slightly below trend in the Communications Dimension and above trend in the IT Accessibility Program Office, Human Capital, Culture, and Leadership, Technology Lifecycle Activities, and Training Dimensions.

## Summary

Similar to the High-Very Low Category and given relatively high maturity outcomes and a preponderance of responses stating that the entity does not have resources to test for ICT conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing processes and capabilities and focusing on testing and remediation to improve conformance outcomes.

## High-Moderate

- Number of entities in Category: 14
- Average Maturity Score: 3.42
- Average Conformance Score: 2.54
- Two Lowest Average Dimensions: Human Capital, Culture, and Leadership (2.59), Training (2.66)
- Two Highest Average Maturity Scores: Content Creation (4.06), Acquisition and Procurement (3.71)

## Highlighted Outcomes:

- All entities reported that Section 508 reviews are almost always (9 entities, 64%) or frequently (5 entities, 36%) integrated into the reporting entity's electronic content prior to publication.
- 12 entities (86%) reported they almost always implement and produce reliable test results using standard processes for validating web content conformance to Section 508 standards.
- 10 entities (71%) said some of the development or testing professionals responsible for reporting entity web content are trained in Section 508 conformance validation testing, but the training is ad hoc.
- 6 entities (43%) reported they either did not have resources to test their top 10 publicly available internet pages (5 entities, 36%) or they did test and no pages were fully conformant (1 entity, 7%). The other entities in this category tested and reported at least one fully conformant page in their top 10 web pages (8 entities, 57%) with 6 entities (43%) having 50% of pages or more being fully conformant
- All entities either do not use a video player (3 entities, 21%) or reported the conformance of the enterprise-wide video player to standards was 50% or greater (11 entities, 79%), with 6 (43%) reporting that it conforms to 100% of requirements.
- Entities in this category performed below trend in the Human Capital, Culture, and Leadership and Training Dimensions and slightly above trend in the Communications Dimension.

## Summary

Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.

## High-High

- Number of entities in Category: 11
- Average Maturity Score: 3.34
- Average Conformance Score: 3.41
- Two Lowest Average Dimensions: Technology Lifecycle Activities (2.76) Human Capital, Culture, and Leadership (2.93)
- Two Highest Average Maturity Scores: IT Accessibility Program Office (3.75), Communications, Testing and Validation (3.58)

## Highlighted Outcomes:

- 10 entities (91%) reported their Section 508 program or equivalent either frequently (1 entity, 9%) or almost always (9 entities, 81%) provides support in response to ICT accessibility-related

questions and support requests. The final entity said they sometimes provide support but generally on an ad hoc basis.

- 6 entities (55%) said any risk assessment is ad hoc and only sometimes used when identifying and prioritizing risk of Section 508 nonconformant ICT using a risk framework throughout the technology development lifecycle.
- 7 entities (64%) reported they never (3 entities, 27%) or only sometimes but generally on an ad hoc basis (4 entities, 36%) conduct web content user testing with people with disabilities prior to deployment to address all applicable Section 508 standards.
- 9 entities (82%) reported 60% or more of their top 10 publicly available internet pages fully conformed to Section 508 standards.
- 8 entities (73%) reported 60% or more of their top 10 documents fully conformed to Section 508 standards.
- Entities in this category performed below trend in the Content Creation, Human Capital, Culture, and Leadership, and Technology Lifecycle Activities Dimensions and slightly above trend in the Policies Procedures, and Practices Dimension

## Summary

Those in the High-High overall performance category should consider a balanced approach to improving maturity, particularly around prioritizing risk in the technology development lifecycle.

## High-Very High

- Number of Entities in Category: 6
- Average Maturity Score: 3.39
- Average Conformance Score: 4.36
- Two Lowest Average Dimensions: Training (2.19), Human Capital, Culture, and Leadership (2.86)
- Two Highest Average Maturity Scores: Content Creation (4.38) Testing and Validation (3.89)

## Highlighted Outcomes:

- 5 entities (83%) reported that their Section 508 program or equivalent almost always provides support in response to ICT accessibility-related questions and support requests. The final entity said they sometimes provide support but generally on an ad hoc basis.
- 3 entities (50%) reported their Section 508 program either never (2 entities, 33%) or only sometimes but generally in an ad hoc manner provides Section 508 conformant information and associated resources to employees in response to an emergency, such as continuity of operations, active shooter, pandemic related, etc.



- All entities reported 70% or more conformance (5 entities, 87%) of their top 10 internal intranet web pages were fully conformant, or do not have any intranet web pages (1 entity, 17%).<sup>36</sup>
- 3 entities (50%) reported their Learning Management System conformed to 90% to 99% of Section 508 requirements. Two (33%) said their LMS conformed to 50% to 90% of requirements. The final entity reported they did not have an LMS.
- Entities in this category performed below trend in the IT Accessibility Program Office, Communications and Training Dimensions and close to trend for all other Dimensions.

## Summary

Those in the High-Very High overall performance category should consider a continuing process improvement that includes incremental improvements in the testing efforts and resourcing, while investing more in accessibility communication and Section 508 program efforts.

## Very High-Very Low

There are no reporting entities that fell into the Very High Maturity-Very Low Conformance Category.

## Very High-Low

- Number of Entities in Category: 3
- Average Maturity Score: 4.18
- Average Conformance Score: 1.74
- Two Lowest Average Dimensions: Policies, Procedures and Practices (3.47), Training (3.54)
- Two Highest Average Maturity Scores: Technology Lifecycle Activities (4.90) Communications (4.69)

## Highlighted Outcomes:

- All entities reported Section 508 is almost always included in ICT governance processes such as milestone reviews, publication or deployment decisions, change control reviews, etc.
- All entities reported their entity almost always includes sufficient ICT accessibility requirements in solicitations.
- All entities reported either none of their top 10 viewed internal intranet pages tested were fully conformant (1 entity, 33%) or that the entity does not have resources to test their top 10 internal internet pages.
- All entities reported either none of the entity's top 10 viewed videos fully conformed to Section 508 standards (2 entities, 67%) or they did not have the resources to test (1 entity, 33%).

<sup>36</sup> One at 70% conformance, one at 90% conformance, three at 100% conformance.

- All entities reported both the surveys distributed by the reporting entity and their enterprise-wide chat or internal real-time messaging system conformed to 90% to 99% of applicable Section 508 requirements.
- Entities in this category performed below trend in the Policies, Procedures, and Practices Dimension and above trend in the Human Capital, Culture, and Leadership Dimension.

## Summary

Those in the Very High-Low overall performance category should invest in testing efforts and resource allocation in order to improve their testing consistency and conformance outcomes.

## Very High-Moderate

- Number of Entities in Category: 2
- Average Maturity Score: 4.51
- Average Conformance Score: 2.88
- Two Lowest Average Dimensions: Content Creation (3.44), Human Capital, Culture, and Leadership (3.75)
- Two Highest Average Maturity Scores: Communications (5.00), Acquisition and Procurement (5.00)

## Highlighted Outcomes:

- All entities reported that they implement a documented complaint process with specific procedures for reporting, assessing, tracking, and resolving Section 508 complaints.
- 1 entity (50%) reported they offer ICT accessibility-related training to employees, including training on guidance, templates, and tools for creating accessible content approximately 5 to 6 times per year. The other entity (50%) reported that it provided training 7 or more times per year.
- All entities said none of their top 10 viewed documents tested fully conformed to Section 508 standards.
- All entities said the reporting entity's publicly-posted Section 508 or ICT accessibility policy conformed to 90% to 99% of relevant Section 508 requirements.
- Entities in this category performed below trend in the Content Creation Dimension and above trend in the Policies, Procedures and Practices, Communications, and Acquisition and Procurement Dimensions.

## Summary

Those in the Very High-Moderate overall performance category should invest in testing efforts and resource allocation in order to improve their testing consistency and conformance outcomes, particularly for internet, intranet and documents testing.

## Very High-High

- Number of entities in Category: 4
- Average Maturity Score: 4.51
- Average Conformance Score: 3.54
- Two Lowest Average Dimensions: Policies, Procedures, and Practices (4.06), Human Capital, Culture, and Leadership (4.06)
- Two Highest Average Maturity Scores: IT Accessibility Program Office (4.94), Technology Lifecycle Activities (4.92)

## Highlighted Outcomes:

- 2 entities (50%) reported that nonconformant digital content is always or almost always tracked and remediated within the reporting entity. The other two entities (50%) said they frequently track and remediate content.
- All entities said ICT accessibility core values have been included in the reporting entity DEIA and mission-related strategic plan, and leadership regularly communicates this core value.
- All 4 entities tested their top 10 public-facing electronic documents with varying degrees of conformance: 1 entity with 20% conformance, one with 30% conformance, one with 40% conformance (and testing only 5 documents), and the final entity with 90% conformance.
- 100% of entities tested their top 5 videos with all being fully conformant.
- Entities in this category performed below trend in the Testing and validation Dimension and above trend in the IT Accessibility Program Office Dimension.

## Summary

Those in the Very High-High overall performance category should continue to make incremental improvements particularly in their testing and remediation efforts due to the variability in conformance results.

## Very High-Very High

- Number of Entities in Category: 5
- Average Maturity Score: 4.36
- Average Conformance Score: 4.43
- Two Lowest Average Dimensions: Policies, Procedures, and Practices (4.00), Training (4.13)
- Two Highest Average Maturity Scores: Content Creation (4.75), Technology Lifecycle Activities (4.50)

### Highlighted Outcomes:

- 3 entities (60%) reported they always or almost always utilize a formal process or plan for creating Section 508 conformant agency official communications. The other 40% (2 entities) said they frequently do so.
- 4 entities (80%) said Section 508 compliance is included in a majority of their organization's ICT-related leadership and management performance plans. The final entity said they do not but have a timetable to begin implementation.
- 4 entities (80%) said either all of their top 10 public-facing internet pages are fully conformant (60%, 3 entities) or they do not have any public webpages (1 entity 20%). The other entity (20%) reported 20% conformance for the tTop 10 pages.
- 100% of entities either reported that their top 5 videos were all fully conformant (80%, 4 entities) or they do not have any public-facing pages (20%, 1 entity).
- Entities in this category performed below trend in the IT Accessibility Program Office, Communications, Technology Lifecycle Activities and Training Dimensions and above trend in the Content Creation Dimension.

### Summary

Those in the Very High-Very High overall performance category should continue to make incremental improvements particularly in their testing and remediation efforts due to the variability in some of their conformance results.

# Recommendations

Congress should update Section 508 of the Rehabilitation Act (29 U.S.C. § 794d) and 29 U.S.C. § 794d-1 to include:

- **Definition of Agencies Subject to Section 508:** Consider clearly defining which federal agencies are subject to Section 508. Confusion as to who should respond to this annual assessment stemmed from ambiguity as to who is subject to Section 508. Clarifying who should be following Section 508 standards will have numerous downstream impacts including the ability to enforce Section 508 compliance and identifying reporting requirements for this assessment.
- **Updated Language, Terminology, and Scope:** The Access Board and GSA receive numerous technical assistance requests every year related to clarification of Section 508 language, terminology, scope and applicability. Given that the original Section 508 language is outdated with the current and evolving digital environment, an update to harmonize and strengthen the language for applicability to the current and future digital landscape would resolve confusion and provide much needed clarification.

**Strengthen Enforcement of Section 508 Compliance:** Congress should explore options to strengthen enforcement of Section 508 compliance across the federal government. As shown throughout this report, overall Section 508 compliance is low. Enforcement through internal audits, accountability mechanisms, among others, would lead to overall improved Section 508 compliance.

**Address Duplicative Digital Accessibility Reporting Requirements:** To prevent duplication and reduce agency burden, Congress may consider clarifying reporting requirements, including the scope of the DOJ biennial report.

**Target Accessibility of High-Use Software:** Congress may continue to consider conducting oversight efforts of major ICT providers to the federal government to determine how to improve accessibility of high-use products. As noted in [Table 4 showcasing response count for Section 508 conformance of ICT products](#), key ICT used both by federal government employees and the public do not fully conform to the Section 508 standards. As agencies universally use office productivity applications, survey tools, and other mainstream IT products, promoting standard Section 508-conformant solutions would enhance ICT accessibility throughout the government.

### **Require Section 508 as a Major Factor in Acquisition:**

As many respondents still [do not consistently include Section 508 requirements in solicitations](#), **Chief Acquisition Officers, CIOs, and Heads of Agencies** should:

- Develop and implement policies that integrate ICT accessibility into all ICT acquisition activities.
- Include Section 508 conformance as a major or technical factor during the award or decision-making process, as appropriate.
- Reject contract deliverables unless they meet Section 508 requirements, as required by the contract.



For example, the Department of Veterans Affairs (VA) integrated Section 508 compliance into the VA Federal Information Technology Acquisition Reform Act (FITARA) approval process, bringing awareness to senior leadership and product owners in the procurement phase.

### **Ensure Sufficient Section 508 Program Resourcing:**

[Better resourced reporting entities tend to have better conformance outcomes](#) and [reporting entities noted that a lack of budget or funding was a major challenge](#). Since additional funding to aid Section 508 implementation is a key factor for helping implement digital accessibility, **agency Chief Information Officers (CIO) or equivalents** should consider appropriately resourcing their Section 508 programs and ensure Section 508 program resourcing is explicitly included in budget requests.

**Incorporate Section 508 Throughout the Technology Lifecycle:** Given that 63% of respondents [do not assess risk of Section 508 nonconformant ICT throughout the technology development lifecycle](#), **agencies** should incorporate digital accessibility considerations into relevant internal control processes to better ensure accessibility throughout the technology lifecycle. As an example, the Environmental Protection Agency (EPA) and the VA include Section 508 compliance as part of the Authority To Operate (ATO) certification process, underscoring the significance of creating and maintaining secure and accessible applications.

**Adopt the Baselines for Web and Electronic Documents:** As testing methodologies and outcomes have been [reported to be inconsistent](#), **agencies** are encouraged to use the [Section 508 ICT Testing Baselines for Web and Electronic Documents](#) to create baseline-aligned test processes. Incorporating the baseline tests into a test process ensures necessary elements are tested, reducing the risk of overlooking important requirements. The baseline provides clear guidance on what needs to be tested, helping organizations assess the accuracy of their testing methodology and tools.

**Increase Conformance Validation Testing and Remediation:** The average conformance continues to be under 2.0 on a 5-point [conformance Index](#) scale and 50% or more respondents said [they did](#)

[not have resources to test their ICT](#). Therefore, **agencies** should increase automated and manual Section 508 conformance testing, validation, and defect remediation before deployment. Increased validation will likely create substantial positive downstream impacts as more conformant products and services are deployed.

**Require Annual Section 508 Training by Roles and Responsibilities:** Although a significant improvement from last year, only about [34% of entities reported require any Section 508 training for employees](#). Additionally [37% of respondents have no Section 508 training plan defined](#). **Agencies** should require annual Section 508 training for all employees who create, maintain, or otherwise contribute to the agencies' digital content. An example of such training can be seen in [Section 508: What It Is and Why It's Important?](#) In addition:

- It is recommended the following online training courses or equivalent be required to achieve COR Certification:
  - Micro-Purchases and Section 508 Requirements (FAC 047)
  - Soliciting and Evaluating Accessibility Conformance Reports in Federal ICT Procurement (FAC 049)
  - Procuring Section 508 Conformant ICT Products and Services (FAC 056)
- As only 18% of respondents require Section 508 training for developers and 26% of respondents require Section 508 training for web content managers, **agencies** are encouraged to require training for all ICT testers on agency testing methodologies. One example methodology would be [Trusted Tester Conformance Test Process for Web](#) developed by the Department of Homeland Security.

**Invest in Human Capital, Culture, and Leadership Efforts:** For 141 entities, or approximately 58%, [either the accessibility performance metrics are unknown or there are no such metrics in leadership performance plans and no current intent to include them](#). **Agencies** should develop accessibility-related metrics to include in annual leadership performance plans. Increasing accountability may increase prioritization of digital accessibility, likely improving conformance of ICT.



# Recent and Upcoming GSA Efforts to Improve Section 508 Compliance

## Recent GSA Efforts to Improve Section 508 Compliance

The following describes GSA's efforts to help entities collect and submit their Assessment data and related efforts to improve federal digital accessibility from December 29, 2023, to December 29, 2024.

### Governmentwide Assessment-Related Actions

- OMB – in close coordination with GSA, the Access Board, and OSTP – refined the assessment criteria from FY23 to reduce technical assistance, improve terminology, question comprehension, data quality, and insights into reporting entity accessibility maturity and overall conformance. GSA actions included:
  - Incorporating feedback on the criteria.
  - Introducing questions that will increase insight into governmentwide accessibility, such as expansion of hardware and software questions.
  - Removing questions that did not derive much value.
  - Asking specific questions cyclically instead of asking every question every year.
  - Developing trend-based assumptions, hypotheses, and questions to enable evaluation.
- In tandem, GSA gathered feedback from federal Section 508 Program Managers (PMs) and assessment points of contact (POC) to refine context for understanding the assessment criteria, frequently asked questions, and definitions of terms to help reporting entities collect more accurate data.
- GSA also implemented improvements in the following related areas:
  - **Office Hours:** In collaboration with the Access Board, GSA hosted 11 office hours meetings between April and August to offer additional guidance to reporting entities preparing reports for this assessment.
  - **Submission Tool Training:** GSA responded to feedback from the assessment team regarding data validity and consistency issues. Recognizing the same submission tool would be used for FY24, GSA conducted three submission tool training sessions for assessment points of contact. This training aimed to improve data quality, reduce the need for office hours and technical assistance, and enhance the overall customer experience.
  - **Independent Testing:** GSA developed a framework for conducting limited independent testing of agency public websites and electronic documents. This framework enables the assessment team to validate reported data through “spot checks,” ensuring more

consistent and reliable data for the Assessment. Independent testing will not replace reporting entity submitted data, but will be used in tandem with submitted data to inform data validation. The scope of independence testing will be dependent on resourcing in FY25.

## Key Performance Indicators

In the beginning of FY25, GSA created a list of key performance indicators (KPIs) to help agencies create measurable targets for improving the maturity and conformance outcomes of their Section 508 Programs or equivalents. These indicators, once implemented, will serve as strategic specific, measurable, achievable, relevant and time-bound (SMART) goals for agencies to track progress across the enterprise with respect to accessibility considerations. These KPIs broadly cover business functions with the intent that agencies select which KPI to employ based on their current situation (i.e., overall maturity, testing capability, conformance outcomes, etc.). Not all KPIs will apply to all agencies, but all agencies should be able to take a few KPIs to help measure and track their progress.<sup>37</sup> See Table 13 below for a sample of these KPIs and visit [Section508.gov](https://Section508.gov) for the complete list.

**Table 13: Sample KPIs**

KPI Short Name	Draft KPI	Aligned Dimension
<b>Role-Based Training</b>	Content Creation: By Q3 FY27, 100% of the web content managers have completed the required, relevant Section 508 training.  Developers: By Q4 FY26, 50% of agency designers, developers and testers have completed assigned Section 508 training.	General Information
<b>PM Role Creation</b>	By Q2 FY26, create a formal Section 508 Program Manager role and hire a qualified individual within 6 months of establishment.	IT Accessibility Program Office
<b>Complaints Response Time</b>	In FY26, respond to and resolve 75% of complaints within 60 calendar days.	Policies, Procedures, and Practices
<b>Disability Group Engagement</b>	In FY26, conduct outreach to at least three of disability-related affinity groups to garner feedback and incorporate into agency policies, process and standard procedures.	Human Capital, Culture, and Leadership
<b>Automated Document testing</b>	In FY27, conduct comprehensive automated testing on 35% of all new entity online documents prior to document distribution.	Testing and Validation

<sup>37</sup> For instance, one KPI concerns the purchase of an accessible Learning Management System (LMS). Not all agencies will even require an LMS depending on their size, mission or other factors and thus this KPI would not apply.

KPI Short Name	Draft KPI	Aligned Dimension
Automated and Manual Web Page Testing	By Q4 FY24, test 15% of internet web pages using automated and manual testing.	Conformance Metrics

## GSA Actions to Support Implementation of M-24-08:

- In consultation with the Access Board, GSA explored options for establishing a standardized accessibility conformance reporting (ACR) process for government procurement of ICT, including a central repository of vendor accessibility conformance reports.
  - In coordination with the [Federal Chief Information Officers Council \(CIOC\) Accessibility Community of Practice \(ACOP\)](#) leadership, the Access Board and GSA led the creation of “Basic Accessibility Conformance Report (ACR) Evaluation and User Guidance” to assist federal agencies and improve Section 508 implementation procedures for the procurement of ICT. This guidance presents a framework on how to obtain and evaluate ACRs. Following the completion of the guidance, they conducted multiple briefings to key stakeholder federal councils, including the CIO Council.
- During FY24 and moving forward into FY25, GSA has advised the Federal Acquisition Service (FAS) to help agencies acquire products and services related to the accessibility of ICT. FAS, with the support of GSA, has also explored solutions that enable Digital Accessibility as a Service, such as consulting, testing, training, and remediation. This would allow for smaller agencies to access accessibility tools and services through a newly established accessibility services purchasing schedule.
- With the Access Board and the Office of Personnel Management (OPM), GSA reviewed existing certifications to determine the potential use as a Section 508 professional certification programs for Section 508 PMs, identified opportunities to establish a professional Section 508 PM certification program with three tiers of trainings, and aligned where commercial certifications may be used to further Section 508 PM training and capabilities as part of the Section 508 PM certification.
- In consultation with the Access Board, GSA explored establishing a federal digital accessibility design and testing lab staffed with accessibility specialists who perform automated and manual testing and assessments of agency ICT, as well as provide user research and usability testing related to ICT accessibility.

## Policy and Best Practices

- GSA regularly maintains and improves [Section508.gov](#) as the central body of role-based information to help federal agencies incorporate accessibility into mission and IT-lifecycle activities. This governmentwide hub provides robust content, tools, best practices, and training to all stakeholders in ICT accessibility. Selected content focuses on:
  - Policy, Management, and General Information

- Acquisition
- Content Creation
- Design and Development
- ICT Accessibility Testing
- Training, Tools, and Accessibility Events
- Agency Section 508 PM List
- Specific updates include:
  - [Best practices for creating and updating accessibility statements including examples](#)
  - [Best practices for establishing and maintaining a public feedback mechanism](#)
  - [Best practices for establishing and maintaining a formal Section 508 complaint process](#)
  - [Common PDF Tags and Their Usage](#)
  - [Considerations for Publishing a Page to the Web](#)
  - [Creating Accessible Email Messages](#)
  - [Designing Digital Content for Users With Cognitive Disabilities](#)
- GSA conducted a “High Achiever Study” to enhance the [Technology Accessibility Playbook](#), which is currently published on [Section508.gov](#). GSA interviewed high-performing agencies on their FY23 Assessment responses to provide insights into how agencies may improve accessibility within their program. GSA is developing an addition to the playbook to create a model program. This addition will also include tools, templates, and other artifacts to assist agencies with implementing the plays from the playbook.

## Strategic Engagement

- At the 2023 Government Information Technology Executive Council (GITEC) Emerging Technology Conference, the Advanced Technology Academic Research Center (ATARC) awarded the GSA Government-wide IT Accessibility Program in the category of Promoting Diversity, Equity, Inclusion, and Accessibility (DEIA) in the federal workforce. This award recognized the program for its exceptional leadership in addressing DEIA challenges, partnership with federal and outside organizations, and transformative impact on IT accessibility across the federal government.
- GSA participated in key government and external forums for ICT accessibility, including:
  - Hosting the FY24 Interagency Accessibility Forum (IAAF), a venue for federal accessibility professionals, developers, designers, project managers, leadership and many others to exchange best practices in managing and implementing digital accessibility imperatives including Section 508 of the Rehabilitation Act. GSA did this in partnership with other federal agencies with sponsorship by the CIOC ACOP.

- In collaboration with the Access Board, presenting at the [2024 California State University, Northridge \(CSUN\) Assistive Technology Conference](#) on the Section 508 ICT Testing Baseline Portfolio, OpenACR and the Future of Accessibility Conformance Reporting, the analytical approach to the Assessment, and an introduction to the ART, from March 19 to 21, 2024.
- At the Government Innovation Exchange, participating in two panel discussions:
  - “CX in Government: Defining Digital Strategies,” which covered best practices for enhancing customer experience (CX) beyond 2024, shared insights from implementing CX initiatives, and highlighted the importance of accessibility for all citizens.
  - “The Way Forward for Government IT: Anticipating Future Considerations for Federal and State IT,” which explored technological factors, drew insights from the past five years of IT experiences, and addressed emerging threats.
- At Government DX, participating in the fireside chat, “Accessing Accessibility: Going Beyond Section 508 Compliance in Digital Service Delivery,” in which they discussed how leaders can leverage accessibility and usability testing and the U.S. Web Design System to ensure equitable access.
- To celebrate Global Accessibility Awareness Day, participating in a Digital Services Coalition panel event entitled Beyond Compliance: Building Inclusive Digital Experiences that focused on how to advance accessible digital services for all citizens.
- Participating in the 2024 Defense Contract Management Agency (DCMA) Section 508 Fielding Awareness Conference on procurement tools.
- At the 2024 Equal Employment Opportunity Commission (EEOC) EXCEL Training Conference, providing an overview of the FY23 Governmentwide Section 508 Assessment to highlight relevance to employment law and noted resources available to [Section508.gov](#) to help organizations improve management and implementation of digital accessibility imperatives.
- At the 2024 M-Enabling Summit, participating in three panel discussions related to the Annual Assessment, Standardizing the Federal Accessibility Conformance Reporting Process, and the New Rule for State and Local Government Web Content and Mobile Application Accessibility
- GSA conducted presentations to the governments of Canada and the United Kingdom and multiple federal agencies on the development and use of the IT Accessibility Policy Framework to improve incorporation of accessibility requirements throughout relevant organizational policies.

- GSA created and launched the following two regularly distributed publications:
  - The bimonthly Digital Accessibility Newsletter, which shares announcements, news, online resource updates, and upcoming events designed to help digital accessibility practitioners improve the accessibility of the information, communications, and technology created for federal employees and the public.
  - The monthly [Accessibility Bytes](#), which provides quick tips for digital accessibility practitioners to enhance the accessibility of the information, communications, and technology they create for federal employees and the public.
- GSA leads regular, recurring governmentwide meetings for collaboration, training and knowledge sharing of accessibility information and considerations. This includes:
  - Section 508 and IT Accessibility Community of Practice (SEC508ITAC CoP) meetings and email listserv of over 1,240 subscribers that facilitate collaboration and resource sharing across federal, state, and local governments, as well as with academia who are focused on building better digital experience in government. SEC508ITAC is one of 30 CoPs available at [Digital.gov/communities](https://digital.gov/communities).
  - Bimonthly Section 508 Program Manager Huddle, with support from the Access Board, provides federal Section 508 PMs an open, agenda-free forum to discuss and collaborate on building and maintaining effective Section 508 programs.
  - Bimonthly IT Accessibility Community Meetings provide information and guidance on Section 508 implementation to federal accessibility professionals, practitioners, and members of the SEC508ITAC. GSA conducted general awareness and “how-to” training sessions during the IT Accessibility Community Meetings that also included input and presentations from members of the community.
- As GSA developed and conducted the Assessment, it also led the below engagements to improve digital accessibility within the past year:
  - In December 2023, GSA presented the [FY23 Governmentwide Section 508 Assessment](#) to the Federal Chief Information Officers Council and led discussion on strategies to improve digital accessibility.
  - In January 2024, GSA presented twice on the [FY23 Governmentwide Section 508 Assessment](#), once in collaboration with the Access Board for the Section 508 webinar series run by the Accessibility Community of Practice and once at a public Access Board meeting with 474 attendees.
  - GSA also presented to numerous other departments, agencies, and stakeholder councils on the outcomes of the FY23 Assessment.

## Technical Assistance, Tools, and Training

- GSA continued the following enhancements to two primary accessibility requirements acquisition tools: the [Solicitations Review Tool \(SRT\)](#) and the [Accessibility Requirements Tool \(ART\)](#):
  - Improvements to ART include adding additional ICT options, adding a delete button, allowing the user to modify inputs, improving the screen reader capabilities, and updating the flow to enhance user experience. New training videos were developed and posted on Section508.gov to help users understand how to use ART.
  - The ART Application Programming Interface (ART-API) was developed as a solution for ART to integrate with other applications to provide the appropriate Section 508 language. It is highly customizable and can be adapted for any application. This is currently in the pilot phase.
  - Improvements to SRT include adding in GSA eBuy Open data, increasing the amount of data processing five-fold, and updating the user interface for an enhanced user experience.
  - GSA provided training to four federal agencies on the ART tool to facilitate their incorporation into procurement and contracting documentation.
- GSA's [ACR Editor](#), which provides a web-based user interface for producing a machine-readable ACR, was migrated to Section508.gov to make it easier to find and navigate within the Section508.gov subdomain.
- The ICT Testing Baseline for Web standardizes and enhances web accessibility conformance tests across the federal government. Agencies now use this baseline as the foundation for evaluating relevant products for Section 508 conformance. In collaboration with strategic partners the Department of Homeland Security, Social Security Administration, Office of Personnel Management, and the Access Board, GSA has continued to develop and extend the ICT Baseline Portfolio:
  - The [Section 508 ICT Testing Baseline for Web](#) version 3.1 was published. Notable changes include:
    - Image tests now rely more heavily on the author's determination of meaningful or decorative images.
    - A new test covers Web Content Accessibility Guidelines (WCAG) Success Criterion 4.1.2 for user controls to improve accuracy.
    - The baseline incorporates WCAG 2.2 "Understanding" articles.
    - A single page view now contains all baseline tests.
  - In September 2024, the [Section 508 ICT Testing Baseline for Electronic Documents](#) version 1 was published. This new baseline utilizes the framework of the Baseline for Web with the goal of improving accessibility compliance for electronic documents. The Federal Accessible Electronic Documents Community of Practice (AED COP) and Baseline for



Documents Technical Advisory Committee authored this baseline. Like the ICT Testing Baseline for Web, the ICT Testing Baseline for Electronic Documents is agnostic regarding testing tools. Each baseline test identifies the accessibility requirement being tested, the document content subject to evaluation, and step-by-step instructions for determining test outcomes. Agencies can employ any tools that align with this baseline to ensure consistent and reliable testing outcomes.

- GSA continued to lead the development of the [ICT Baseline Alignment Framework](#). Throughout FY24, GSA expanded test cases for the ICT Baseline for Web, further enhancing accessibility evaluation practices.
- GSA continued OpenACR Repository development, which will facilitate easier integration of accessibility conformance considerations in federal ICT acquisitions through a centralized, publicly-facing, and searchable repository of ACRs. GSA began developing the OpenACR Editor, which included determining business and technical requirements, back-end and user interface development, and an application programming interface (API).

## Upcoming GSA Efforts to Improve Section 508 Compliance

GSA intends to continue the core efforts as noted above, but also intends to focus on the additional items below in the next year.

### Governmentwide Section 508 Assessment-Related Actions

- GSA plans to create and release a new assessment submission and reporting tool to make reporting easier and more streamlined for respondent use.
- GSA will update key performance indicators (KPIs) as described above based on stakeholder feedback and recommendations.
- GSA and the Access Board intend to facilitate sharing of best practices among reporting entities to help ensure complete and accurate data. This will occur in assessment office hours during the reporting window but also year round and at key events such as the bimonthly Program Manager Huddle and the Interagency Accessibility Forum (IAAF).
- GSA, the Access Board, and OMB plan to facilitate best practices to break down silos across the organization and help component offices prepare for data calls annually. This will help agencies prepare for assessment submission but also help track data across the organization and spur continued process improvement in measuring and reporting accessibility data.
- GSA and OMB intend to engage with relevant stakeholders, including the CIO Council, to refine assessment criteria and reporting requirements.

### Policy and Best Practices

- GSA and the Access Board, along with other government stakeholders, plan to continue the ICT Testing Baseline portfolio development, creating both the Software and Hardware Baseline

working groups and draft baseline documents for each ICT. This will target accessibility testing issues by creating testing standards agency test processes can be measured against in order to ensure these processes and tools are testing accurately and appropriately.

- GSA intends to continue to draft test cases for the [ICT Testing Baseline Alignment Framework for Web](#), adding to the current list and aiming to complete most of the test cases necessary for a pilot.
- GSA intends to improve guidance on how to perform a technology evaluation of ICT in order to improve testing maturity and outcomes. This will be incorporated within the Design and Develop topic area on [Section508.gov](#) and expand the current information on how users evaluate the accessibility of ICT.
- GSA and the Access Board plan to lead efforts on best practices for managing organizational risk related to accessibility issues. This will address the issue demonstrated by the fact that 59% of entities said they either do not prioritize risk during the technology development lifecycle or only sometimes prioritize this risk.

## Strategic Engagement

- GSA, along with its hosting partners, will conduct a hybrid in-person and virtual event for FY25 Interagency Accessibility Forum (IAAF) targeted at training foundational accessibility concepts, improving the shared accessibility knowledge across government, and providing a forum for accessibility professionals to engage with each other. The FY25 IAAF will move to May.
- GSA plans to outline and develop supporting artifacts for an expanded, targeted effort to engage entities one-by-one and assist agencies in assessing certain business functions, develop policies and processes, or conduct one-off analyses in specific areas. The Minimum Viable Product (MVP) of this effort as well as the primary business areas where GSA will assist are yet to be determined.
- GSA will continue to regularly communicate with the digital accessibility community through the listserv, bimonthly newsletters, Accessibility Bytes, and other media opportunities. The Accessibility Bytes publication, in particular, is targeted at helping accessibility professionals instruct their fellow employees on how to reliably create accessible digital content from the start.
- GSA intends to increase engagement with professionals in the Intelligence Community to ensure best practices are shared amongst the federal digital accessibility community.

## Technical Assistance, Tools, and Training

- GSA will regularly update and maintain the knowledge base on [Section508.gov](#) to equip agencies with the essential skills for creating and testing accessible digital content. The focus will continue to cover identified and prioritized gaps that currently exist on the site.
- GSA plans to continue to develop and release new features and enhancements for the ART and

the SRT.

- GSA intends to refine and release the Accessibility Conformance Report (ACR) Repository. In conjunction with GSA's OpenACR effort to create and edit a machine readable ACR data schema and ACRs, GSA will create a MVP version of the repository for listing ACRs. In this new repository, vendors will be able to submit and update ACRs and acquisition professionals will be able to more easily locate and incorporate ACR information into procurement decision-making processes.
- GSA plans to support members of the Federal Acquisition Service to create a Digital Accessibility Marketplace for federal agencies to use for sourcing accessibility products and services.
- GSA intends to develop and release online and instructor-led training based on stakeholder needs and determined gaps. This may also align with recommendations put forth to OMB in a report focused on a recommended Section 508 PM Certification. However, final decision on the certification, including resourcing, timeline, hosting platform or pursuit of the program in general, is yet to be determined.
- GSA plans to develop and release role-specific online training and microlearning for the following workforce categories:
  - Leadership and Oversight
  - Section 508 Program and Policy
  - Acquisition and Procurement
  - Project Execution and Development
  - Communications and Content

## Observations and Acknowledgments

Out of the 245 reporting entities this year, we welcomed 15 new entities who submitted data. Some of these are new components within a department or agency, while others are small and independent agencies reporting for the first time. Additionally, 19 entities that submitted in FY23 did not submit in FY24 due to the following reasons:

- One entity was closed due to an expired statute.
- Twelve entities restructured how they reported, including reporting as a single entity given their Section 508 program structure and, because of reorganization or reclassification, no longer met the threshold of a reporting entity according to their parent agency. Thus, their data was incorporated into another reporting entity's data.
- Six reporting entities did not submit data nor alert OMB or GSA of any changes.

Lastly, several reporting entities changed names. All are denoted in Appendix C.

GSA, OMB, and the Access Board continued to provide multiple channels to provide feedback on assessment criteria and the annual assessment as a whole. Several agencies took the opportunity to meet with OMB or GSA to provide feedback, while others used Office Hours, email, and the feedback form to provide comments and suggestions. GSA, OMB, and the Access Board reviewed all the feedback received and incorporated changes into the assessment criteria for FY24, including significantly truncating questions for clarity and adding percentages directly into answers. Entities noted that adding percentages into the response options for sometimes, regularly, frequently, and almost always was helpful but others noted it was too prescriptive. Some also stated they missed the definitions of these terms in FY23 and, during FY24, selected different answers despite nothing changing other than including the percentage in the question.

We continued to ask for candid responses to the assessment criteria to provide an honest reflection of digital accessibility within the federal government. There continues to be some concerns about the quality of the data – including some entities continuing to note that management asked for response changes to make them look better than day-to-day activities support – and misunderstanding and misinterpretation of the terms used in criteria.

Since we continue to see a misunderstanding of questions and response options, GSA, OMB, and the Access Board will refine and reframe questions and response options for clarity, add content to the Understanding section to explain the question intent and methods to gather information for response options, and continue to add to the definitions of terms. We will also continue to offer office hours during the criteria release through the submission period. GSA is creating a new reporting tool with more data validation and response option limits to reduce each respondent's ability to report invalid or erroneous data. As we work with reporting entities to enhance their understanding of the criteria and hone a reporting tool to flag and reduce errors on input, we hope to have more accurate data in future years. GSA will reach out to each reporting entity with data validation errors to alert them to the flags, provide information on the implications of the data validation, and provide them with additional information to improve data quality in future years.

Reporting entities continued to report issues with the inability to access required information and data. Given the siloed nature of their entity, some data was not obtained, or obtained in time, despite having three months to respond to the assessment criteria. As a result, some entities have drafted internal documents, help videos, POC lists, and data collection requirements so they are able to more effectively gather requested data annually. We encourage entities to share these documents and best practices with other reporting entities. We also received feedback that our criteria were not in plain language therefore internal personnel responsible for answering questions or providing data may not understand the questions and requests. While we understand our terminology is specific to Section 508, we do not feel using plain language in these questions would be effective to meet our task at hand. Instead, we encourage reporting entities to develop their own internal documentation with language used within their own entities to help personnel who may not be familiar with Section 508 more easily respond to this annual data call.

Data validation findings continue to support the misinterpretation or misunderstanding of data with 40 data validation tests revealing 575 validation failures across all data submissions. Out of the 245 reporting entities that submitted data for the Assessment, 182 exhibited at least one validation failure, indicating possible internal inconsistencies within their respective data submissions. Among the reporting entities with validation failures, the median number of failures was 3, with the highest number of failures recorded by a single reporting entity being 15. The most frequent validation failures were as follows:

- Validation 18.3 detected 56 discrepancies between the responses provided for Q36 and Q94. Both questions pertain to the presence of a documented process or procedure for handling Section 508 complaints. The expectation is that if a respondent selects any of the options c), d), or e) for Q36, indicating the presence of a documented process, they should also select a) for Q94, affirming the existence of such a procedure and vice versa. The failures suggest potential misunderstandings of the questions or inconsistencies in the respondents' understanding of

the documented process or procedure for Section 508 complaints.

- Validation 6.1 found 56 discrepancies in the responses provided to Q24 and Q51. Both questions are related to conducting user testing with persons with disabilities (PWD). Specifically, if a reporting entity indicates that it does not conduct user testing with PWD d), they should not also select options a), f), or g) in Q51, which imply the opposite. Similarly, if they select a), f), or g) in Q51, suggesting they do conduct such testing, they should not select d) in Q24. The inconsistencies in the responses may indicate a reporting entity expresses an intention or aspiration to include PWD in testing but does not follow through in practice.
- Validation 7.2 revealed in 48 failures where reporting entities indicated in Q55 that they use specific methods—options b), c), d), or e)—for testing electronic document conformance but did not select option d) in Q9, which indicates the use of a test process for electronic documents. To test electronic documents effectively, they also perform evaluations using a documented test process. The lack of alignment between Q55 and Q9 suggests a possible oversight or gap in the reporting entities' testing procedures.

Other data validation flags, such as contradictory responses or responses that exceed or do not total when required 100%, are denoted in [Data Validation for FY24 Governmentwide Annual Assessment](#).

As with FY23, no data was excluded from analysis regardless of data validation outcomes for FY24. However, before conducting the 40 validation tests, GSA carried out a preliminary review to identify and address data discrepancies that would skew descriptive statistics related to conformance. This process included direct engagement with reporting entities to correct invalid data, which was undertaken in FY23. Specific discrepancies addressed during this preliminary review included:

- Eight reporting entities submitted values for 69a and 74a that were numbers above a percentage out of 100. Given our reporting tool limitations, we could not set upper bounds of the data input field to reduce incorrect data submissions. Because this data was used to inform the conformance index, these entities were given five business days after the submission window closed to provide a corrected submission. All eight provided updated data that is reflected in the public data set. That corrected data was used for analysis and displayed in the reporting entity submission data.
- Three reporting entities submitted numbers for Q2 that were flagged by validation checks as outliers for being very high or invalid given their answer to Q1. These entities were given five business days after the submission window closed to provide a corrected submission. Only one entity chose to submit a correction; where Q2 data was used, the two other entities were included in the calculation but with a footnote to include findings if they were omitted.

Agencies noted that the Assessment and its publicly posted data, the M-24-08 memo, and OMB meetings with agency CIOs and Section 508 PMs have led agencies to pay attention to Section 508

and prioritize their Section 508 programs. Agencies also noted they have to engage other offices within the agency to gather assessment data and a byproduct of that is the realization they too have a part to play in their overall agency accessibility posture. Agencies have also noted using the Assessment as a roadmap to improve their programs. Some have openly acknowledged the lack of talent, knowledge, and subject matter expertise in the digital accessibility field as well as the limitations in acquisitions oversight and inclusion of sufficient Section 508 requirements in procurement. These are some areas we hope to improve in future years.

We want to extend our heartfelt thanks to everyone who participated in the FY24 Governmentwide Section 508 Assessment. The FY24 Assessment report highlights the positive impact of your involvement and we eagerly anticipate the continued benefits of future assessments. These reports and associated data will help ensure all agencies meet the standards for providing equal access to ICT and digital services. The ongoing investments by these entities will further improve digital accessibility across the federal government.

# Appendix A: Terms, Definitions, and Acronyms

## Terms and Definitions

The following terms are used in this report. Additional definitions and terms used within instructions and criteria can be found on [Section508.gov’s Annual Section 508 Assessment Definition of Terms](#).

**Table A1: Definition of Terms**

Term	Full Term
<b>ACR</b>	An Accessibility Conformance Report (ACR) is a document that explains the extent to which a product conforms to accessibility standards such as WCAG or Section 508 Technical Standards. A common way an ACR is completed is by using the VPAT® template created by the IT Industry Council (ITI), but other methods are used across government.
<b>ACR Repository</b>	A centralized location for ACRs to live and make it easy for buyers to review the documents.
<b>ANDI</b>	The Accessible Name and Description Inspector (ANDI) is a free accessibility testing tool created by the Social Security Administration.
<b>Agency</b>	<p>Within this document, “agency” includes any federal department, component-level, and independent agencies subject to Section 508 of the Rehabilitation Act; generally used where this report offers recommendations and shares GSA efforts to increase Section 508 compliance.</p> <p>This report uses the term “reporting entity” rather than “agency” or “component” as traditionally defined because reporting entity Section 508 Programs may be organized and function outside of these traditional definitions; generally used for data-driven findings, observations and overall performance category recommendations.</p>



Term	Full Term
<b>ART</b>	The Accessibility Requirements Tool (ART) is a step-by-step guide created by GSA to help easily identify relevant accessibility requirements from the Revised Section 508 Standards and incorporate them into procurement and contracting documentation.
<b>Artificial Intelligence</b>	Refers to the simulation of human intelligence processes by machines, especially computer systems.
<b>Bracket</b>	Describes the groupings of reporting entities for business function maturity and operational conformance. Brackets include Very Low, Low, Moderate, High, and Very High. The pairing of a maturity bracket and conformance bracket, such as High-Moderate, is referred to as an overall performance “category” throughout this assessment.
<b>Business Function Maturity</b>	Or simply “maturity,” as it is referenced throughout this document, approximates the level of development and advancement of a reporting entity’s Section 508 Program as well as other functions across the organization, or business, that are relevant to digital accessibility. It assesses the reporting entity’s responses to the criteria within 9 maturity dimensions (Q29-Q66 See <a href="#">FY24 Data Dictionary [XLSX]</a> ). These questions cover different aspects of their Section 508 Program or equivalent as well as accessibility-related activities across the organization. Business function maturity, or “maturity,” is evaluated by the maturity index or “m-index” and utilizes a scale ranging from 0 to 5, with 0 indicating a very low maturity level and 5 indicating a very high maturity level.
<b>C-Index</b>	Assesses reporting entity conformance related to approximation of conformance to Section 508 standards. It measures how well reporting entities meet specific criteria within the Conformance dimension, using numerical values and weights for 16 criteria, including Q69a, Q71, Q74a, Q76, Q77, Q78, and Q80 to Q89. (See <a href="#">FY24 Data Dictionary [XLSX]</a> .) The index uses a scale from 0 to 5, with 0 representing very low and 5 representing very high conformance levels.
<b>Category</b>	Or Overall Performance Category. Used to describe groupings of reporting entities that fall within each pairing of the Maturity and Conformance bracket. As there are five maturity brackets (ranging from Very Low to Very High) and five conformance brackets (also ranging from Very Low to Very High), there are 25 total Overall Performance Categories. These categories are always titled by Maturity first and Conformance second, i.e., Very Low-Very Low, Moderate - Low and so on.

Term	Full Term
<b>CFO Act Agency</b>	<p>The 1990 CFO Act gave OMB new authority and responsibility for directing federal financial management, modernizing the government’s financial management systems, and strengthening financial reporting. This act applies to 24 departments and agencies. The 24 CFO Act Agencies include:</p> <p>Agency for International Development</p> <p>Department of Agriculture</p> <p>Department of Commerce</p> <p>Department of Defense</p> <p>Department of Education</p> <p>Department of Energy</p> <p>Department of Health and Human Services</p> <p>Department of Homeland Security</p> <p>Department of Housing and Urban Development</p> <p>Department of the Interior</p> <p>Department of Justice</p> <p>Department of Labor</p> <p>Department of State</p> <p>Department of Transportation</p> <p>Department of the Treasury</p> <p>Department of Veterans Affairs</p> <p>Environmental Protection Agency</p> <p>General Services Administration</p> <p>National Aeronautics and Space Administration</p> <p>National Science Foundation</p> <p>Nuclear Regulatory Commission</p> <p>Office of Personnel Management</p> <p>Small Business Administration</p> <p>Social Security Administration</p>

Term	Full Term
<b>Component</b>	Within this document, the use of “component,” “component agency,” and “component-level agency” broadly refers to the organizational unit below a department or large agency enterprise level. Agencies across government have different designations and terminology for these organizational units, including component, bureau, administration, office, operating division, agency, and subagency. For example: the Department of Defense (DOD) and the Department of the Navy (NAVY) would be considered agencies. NAVAIR, a subunit of NAVY, was submitted as part of NAVY.
<b>Conformance</b>	Refers to a reporting entity’s adherence to the applicable parts of the ICT Final Standards and Guidelines known as the Section 508 standards, ensuring that its information technology products and services are Section 508 conformant, including websites, software, documents, and digital content. For example, for a web page to fully conform to Section 508, the entire web page must meet all applicable 38 WCAG Level A and AA Success Criteria. Also, a shorthand way of referring to operational conformance. See Operational Conformance for full definition.
<b>Criteria</b>	Refers to the 103 Assessment criteria (See <a href="#">FY24 Data Dictionary [XLSX]</a> ) that reporting entities responded to, split into 11 dimensions. Due to dependencies, some reporting entities may have responded to fewer than 103 criteria. Also denoted with “Q” before a number to identify specific criteria referenced. The terms criteria, metric, and question are used interchangeably when referring to the content to which reporting entities responded.
<b>Dimension</b>	Refers to the categorization of the 103 criteria into general questions, maturity questions and conformance questions. The Assessment criteria comprised 11 dimensions.
<b>High</b>	Indicates that the maturity and conformance levels are considerably close to the desired standard. There is some improvement needed to optimize business functions and conformance to the Section 508 standards.
<b>ICT</b>	<p>Information and Communication Technology, which is defined by the <a href="#">Access Board in Appendix A to Part 1194 – Section 508 of the Rehabilitation Act: Application and Scoping Requirements in E103.4 Defined Terms Access Board</a> in E103.4 Defined Terms Access Board as “[i]nformation technology and other equipment, systems, technologies, or processes, for which the principal function is the creation, manipulation, storage, display, receipt, or transmission of electronic data and information, as well as any associated content. Examples of ICT include, but are not limited to: computers and peripheral equipment; information kiosks and transaction machines; telecommunications equipment; customer premises equipment; multifunction office machines; software; applications; Web sites; videos; and, electronic documents.”</p> <p>ICT accessibility and digital accessibility may be used interchangeably.</p>

Term	Full Term
<b>Information Technology</b>	<p>1. With respect to an executive agency means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by the executive agency, if the equipment is used by the executive agency directly or is used by a contractor under a contract with the executive agency that requires the use:</p> <ol style="list-style-type: none"> <li>1. Of that equipment.</li> <li>2. Of that equipment to a significant extent in the performance of a service or the furnishing of a product.</li> </ol> <p>2. Includes computers; ancillary equipment including imaging peripherals, input, output, and storage devices necessary for security and surveillance; peripheral equipment designed to be controlled by the central processing unit of a computer, software, firmware and similar procedures; services including support services; and related resources.</p> <p>3. Does not include any equipment acquired by a federal contractor incidental to a federal contract.</p>
<b>Low</b>	Suggests the maturity or conformance is below the desired standard but not as far from it as “Very Low.” There’s room for improvement in multiple areas and improvements most likely will be multifaceted.
<b>Machine Learning</b>	Described as a subset of AI where algorithms improve automatically through experience. It is relevant in the context of accessibility tools and analytics in government operations.
<b>Maturity</b>	A shorthand way of referring to business function maturity. See business function maturity for full definition.
<b>Metric</b>	Refers to the 103 Assessment criteria that reporting entities responded to, split out into 11 dimensions. Due to dependencies, some reporting entities may have responded to fewer than 103 criteria. Also denoted with “Q” before a number to identify specific criteria referenced. The terms criteria, metric, and question are used interchangeably when referring to the content reporting entities responded to.
<b>Moderate</b>	Signifies the maturity or conformance is average. It meets some standards but still has room for enhancement in certain areas across maturity or conformance.
<b>M-Index</b>	A measure of a reporting entity’s Section 508 Program maturity. It assesses reporting entity responses to criteria across 9 dimensions, including various aspects of their IT Accessibility Program. The index uses a scale from 0 to 5, with 0 representing very low and 5 representing very high maturity levels.
<b>Natural Language Processing</b>	Defined as a field of AI focused on the interaction between computers and human language, important for speech recognition and accessibility software.

Term	Full Term
<b>Operational Conformance</b>	Or simply referenced as “conformance” throughout this document. Operational conformance approximates how effectively reporting entities adhere to the relevant requirements for Section 508. Operational conformance is measured by the conformance index or “c-index,” which assesses a reporting entity conformance by quantifying their responses to 16 specific criteria within the Conformance dimension. These criteria include Q69a, Q71, Q74a, Q76, Q77, Q78, and Q80-Q89 (See <a href="#">FY24 Data Dictionary [XLSX]</a> ). Each of these criteria is assigned numerical values and weights to determine overall conformance.
<b>Overall Performance</b>	See also Category, which is used interchangeably. Used to describe groupings of reporting entities that fall within each pairing of the Maturity and Conformance bracket. As there are five maturity brackets ranging from Very Low to Very High and five conformance brackets, also ranging from Very Low to Very High, there are 25 total Overall Performance Categories. These categories are always titled by Maturity first and Conformance second, i.e., Very Low-Very Low, Moderate - Low, and so on.
<b>Reporting Entity</b>	<p>Reporting entity denotes a respondent to the Assessment. This report uses the term “reporting entity” rather than “agency” or “component” as traditionally defined because reporting entity Section 508 Programs may be organized and function outside of these traditional definitions. Thus, reporting entities are loosely based on:</p> <p>“Agency,” which broadly applied to organizational components such as bureau, office, component, or at the department level, e.g., headquarters.</p> <p>“Component,” which broadly applies to an organizational unit below, usually one level, a department or large agency enterprise level. For example:</p> <p>The Department of Defense (DOD) and the Department of the Navy (NAVY) would be considered agencies. NAVAIR, a subunit of NAVY, was submitted as part of NAVY.</p>
<b>Question</b>	Refers to the 103 Assessment criteria reporting entities responded to, split out into 11 dimensions. Due to dependencies, some reporting entities may have responded to fewer than 103 criteria. Also denoted with “Q” before a number to identify specific criteria referenced. The terms criteria, metric, and question are used interchangeably when referring to the content to which reporting entities responded.
<b>SRT</b>	SRT stands for Solicitation Review Tool, which is a GSA-developed tool built using open source technology, artificial intelligence (AI), natural language processing, text mining, and machine learning algorithms to automatically identify whether new solicitations posted to “Contracting Opportunities” (SAM.gov) are solicitations for ICT.
<b>Very High</b>	Represents the highest level of maturity or conformance, signifying that it aligns closely with the desired standard in most areas across maturity and conformance.

Term	Full Term
<b>Very Low</b>	Indicates the maturity or conformance level is significantly below the desired standard, requiring substantial improvements in multiple areas across maturity and conformance.
<b>VPAT®</b>	VPAT® stands for Voluntary Accessibility Conformance Report, which is a product of the Information Technology Industry Council. The VPAT® is a reporting format for assisting buyers and sellers to identify information and communications technology (ICT) products and services with accessibility features. A completed VPAT® is referred to as an Accessibility Conformance Report (ACR).

## Acronym List

Note: Definitions for many of these terms are included in Terms and Definitions in Table A1.

**Table A2. List of acronyms and full terms**

Acronym	Full Term
<b>ACOP</b>	Accessibility Community of Practice
<b>ACR</b>	Accessibility Conformance Report
<b>ADA</b>	Americans with Disabilities Act of 1990, as Amended
<b>ANDI</b>	Accessible Name and Description Inspector
<b>API</b>	Application Programming Interface
<b>ART</b>	Accessibility Requirements Tool
<b>ATO</b>	Authority to Operate
<b>CAO</b>	Chief Acquisition Officer
<b>CFO</b>	Chief Financial Officer
<b>CHCO</b>	Chief Human Capital Officer
<b>CIO</b>	Chief Information Officer
<b>CIOC</b>	Chief information Officers Council
<b>CoP</b>	Community of Practice

<b>Acronym</b>	<b>Full Term</b>
<b>COR</b>	Contracting Officer's Representative
<b>COTR</b>	Contracting Officer's Technical Representative
<b>CSUN</b>	California State University, Northridge
<b>CSV</b>	Comma-Separated Values
<b>CX</b>	Customer Experience
<b>DEIA</b>	Diversity, Equity, Inclusion, and Accessibility
<b>DHS</b>	Department of Homeland Security
<b>DOD</b>	Department of Defense
<b>DOJ</b>	Department of Justice
<b>EEO</b>	Equal Employment Opportunity
<b>EEOC</b>	Equal Employment Opportunity Commission
<b>EO</b>	Executive Order
<b>EPA</b>	Environmental Protection Agency
<b>FAI</b>	Federal Acquisition Institute
<b>FAQs</b>	Frequently Asked Questions
<b>FAR</b>	Federal Acquisition Regulation
<b>FAS</b>	Federal Acquisition Service
<b>FTE</b>	Full-time equivalent
<b>FY</b>	Fiscal Year
<b>GAO</b>	Government Accountability Office
<b>GSA</b>	General Services Administration
<b>HHS</b>	Department of Health and Human Services
<b>HTML</b>	HyperText Markup Language
<b>IAAF</b>	Interagency Accessibility Forum

Acronym	Full Term
ICT	Information and Communications Technology
IG	Inspector General
IT	Information Technology
ITACM	IT Accessibility Community Meeting
JSON	JavaScript Object Notation
KPI	Key Performance Indicator
NAVAIR	Naval Air Systems Command
OGP	Office of Government-wide Policy
OMB	Office of Management and Budget
OPM	Office of Personnel Management
OSTP	Office of Science and Technology Policy
PDF	Portable Document Format
PM	Program Manager
POC	Point of Contact
PWD	Persons with Disabilities
Q	Refers to “Criteria.” Using a Q in front of a number denotes a specific criteria, also referred to as “Questions” or “Metrics.”
R <sup>2</sup>	Coefficient of Determination (Statistical measure used in regression analysis)
SOP	Standard Operating Procedure
SME	Subject Matter Expert
SRT	Solicitation Review Tool
SSA	Social Security Administration
TT v5	Trusted Tester Process Version 5
VA	Department of Veterans Affairs



Acronym	Full Term
<b>VPAT®</b>	Voluntary Product Accessibility Template
<b>W3C</b>	World Wide Web Consortium
<b>WAI</b>	Web Accessibility Initiative
<b>YOY</b>	Year-Over-Year

# Appendix B: Methods

## Overview

GSA, OMB, and the U.S. Access Board (Access Board) built upon the groundwork laid by the FY23 Assessment to develop data-driven methods for the FY24 Assessment. (For reference, see [Appendix C: Methods](#) from the FY23 Assessment). We identified primary research questions, transformed them into testable hypotheses structured by Assessment criteria, and conducted statistical analysis to test these hypotheses. Our approach to analysis was designed to gain insight into the current state of Section 508 programs, identify their key drivers, and trace their evolution year over year. Notably, access to two reporting periods' worth of Assessment data gave us a new opportunity to pursue analysis of how Section 508 Programs changed over time. (See Pre-Post Analysis.)

## Development and Dissemination of Assessment Criteria

To better evaluate the current state of Section 508 compliance and digital accessibility across the federal government, GSA and OMB, in collaboration with the Access Board and OSTP, refined the FY23 Assessment criteria language for FY24 with a focus on making questions and response options easier to interpret. For example, we used the term “reporting entity” in place of “agency” to encompass both agencies, i.e., bureaus, departments, and headquarters, and components, i.e., organizational units that reside within a department or large agency. Additionally, we added frequency percentages for never, sometimes, regularly, frequently, and almost always directly to response options to enhance clarity. We introduced several new questions, covering topics such as total federal employees, ICT test processes utilized, and exceptions processes. We also introduced 10 new questions—questions 80 to 89—on a rotating basis to broaden the scope of inquiries regarding ICT. We removed five questions due to data quality issues or redundancies and significantly revised answer choices for the following criteria: questions 30 to 33, 36 specifically answer choice d), 39 to 42, 53 to 57, 60, 62 to 63, and 65. All 103 questions were mandatory for FY24, some with dependencies. For a complete list of Assessment criteria changes, please reference this [crosswalk between FY23 criteria to FY24 criteria](#).

While the criteria underwent minor structural changes, their major organizing framework remained intact. Please see the subsection in [Appendix C: Methods](#) from the FY23 Assessment for more information on how we developed the original Assessment criteria. The 11 dimensions that categorize the criteria remained unchanged from FY23. Table B1 describes each of the 11 dimensions.

**Table B1. Description of Assessment dimensions.**

<b>Dimension</b>	<b>Description</b>
<b>General Information</b>	Information and metrics related to the reporting entity Section 508 Program or equivalent activities.
<b>IT Accessibility Program Office</b>	Reporting entity's program management, reporting, benchmarking, risk management, continuous process improvement, and other business-related functions that align to the development, implementation, and maintenance of the reporting entity's Section 508 Program or equivalent.
<b>Policies, Procedures, and Standards</b>	Reporting entity's development, implementation, and continuous improvement of digital accessibility-related policies, procedures, directives and standards, and the inclusion of digital accessibility into relevant policies across all business functions of the reporting entity.
<b>Communications</b>	Reporting entity's internal and external communication accessibility considerations.
<b>Content Creation</b>	Reporting entity's development, testing, remediation, and conformance tracking of digital content, including but not limited to documents, presentations, PDFs, spreadsheets, audio, video, multimedia, social media, and digital forms.
<b>Human Capital, Culture, and Leadership</b>	Reporting entity's leadership and professional development, and how digital accessibility is integrated into mission-related strategic planning.
<b>Technology Lifecycle Activities</b>	Reporting entity's level of inclusion of accessibility in the technology lifecycle to include design, development, operation, and maintenance of ICT.
<b>Testing and Validation</b>	Reporting entity's level of inclusion of digital accessibility in the testing and evaluation of reporting entity's products and services, including processes, tools, templates, best practices, and guidance.
<b>Acquisition and Procurement</b>	Reporting entity's level of inclusion of digital accessibility in procurement lifecycle processes.
<b>Training</b>	Reporting entity's development, use, and tracking of digital accessibility-related training.
<b>Conformance Metrics</b>	Specific data points and outcomes related to measuring reporting entity's program inclusion of digital accessibility and conformance to the ICT Standards and Guidelines.

On April 8, 2024, OMB disseminated 103 Assessment criteria to reporting entities that may be subject to Section 508 requirements. OMB distributed this material to heads of reporting entities, reporting entity CIOs, and Section 508 PMs. Simultaneously, GSA posted the Assessment instructions and criteria on [Section508.gov](https://www.section508.gov).

Reporting entities designated POCs and coordinated with OMB to determine their reporting structure as a “reporting entity,” either as a standalone organizational unit or as a component of a larger parent agency. GSA maintained a list of designated POCs in preparation for the release of the reporting tool. The reporting tool was released on May 29, 2024.

## Data Collection

GSA and OMB received data submissions from 245 reporting entities between May 29, 2024, and July 31, 2024. GSA provided reporting entities with a reporting entity-specific link to submit their data within the eight-week reporting submission window. Before data validation and subsequent analysis, the data underwent quality testing to identify and remove outliers, including extreme values and data entry errors.

## Data Validation

GSA developed a script to systematically validate data submitted by reporting entities. Like FY23, this script primarily operated according to conditional if-then logic, relying on interconnections between different response options for a given reporting entity. When the validation tests identified inconsistencies among the response options for a given reporting entity, they triggered flags. While GSA categorized and tabulated these flags, it did not alter or remove any data for analysis. Please refer to the [“Data Validation for FY24 Governmentwide Annual Assessment”](#) for a summary of validation tests, associated flag counts, and the validation script written in R.

## Descriptive Analysis

Our descriptive analysis approach followed the methodology used in the FY23 Assessment. We conducted a descriptive study of the data, akin to an inventory or initial exploration, to provide a holistic view of reporting entity data and determine key patterns and trends. We maintained a dual focus from FY23 on “business function maturity” and “operational conformance,” which is a reporting entity’s conformance to the applicable requirements in the [ICT Standards and Guidelines](#). First, we created an index to assess reporting entity business function maturity (m-index). This index quantified reporting entity responses to criteria across nine dimensions: IT Accessibility Program Office; Policies, Procedures, and Standards; Communications; Content Creation; Human Capital, Culture, and Leadership; Technology Lifecycle Activities; Testing and Validation; Acquisition and Procurement; and Training. The m-index encompassed Questions 29 to 66 and all questions were multiple choice, equally weighted, and scored as follows:

- a) = 0; signifying very low
- b) = 1; signifying low

- c) = 2; signifying moderate
- d) = 3; signifying high
- e) = 4; signifying very high

Furthermore, a selection of “Unknown” received a 0 and a selection of “Not applicable” or “N/A” received a 4. For two criteria (49 and 56), (f) = 4 also signifies Very High. We considered that argument and understood that scoring N/A as a “4” could inflate a reporting entity score for a dimension. Nonetheless, we chose to do this so all reporting entities had an equal number of questions to score—the denominator would be the same for each reporting entity—and no reporting entity was penalized with a low score for N/A, i.e., things that do not apply to them.

Second, we created an operational conformance index, referred to as “conformance” or “c-index,” to assess how well reporting entities performed in meeting Section 508 and digital accessibility requirements. Thus, this index quantified select reporting entity responses to 16 specific criteria in the Conformance section of criteria that directly relate to quantifiable compliance outcomes and included: Q69a, Q71, Q74a, Q76, Q77, Q78, and Q80-Q89. They were assigned numerical values and weighted as shown in Table B2.

**Table B2. Topics, Conversion Approaches, and Weights of Conformance Criteria**

Topic	Criteria	Conversion Approach	Weight
Internet	Q69a	Provided as a percentage by reporting entity; no conversion needed	12.50%
Internet	Q71	Converted the number of fully conformant public internet web pages into a percentage of the total public internet web pages the reporting entity specified	12.50%
Intranet	Q74a	Provided as a percentage by reporting entity; no conversion needed	12.50%
Intranet	Q76	Converted the number of fully conformant internal intranet web pages into a percentage of the total internal intranet web pages the reporting entity specified	12.50%
Documents and Videos	Q77 and Q78	Converted the number of fully conformant electronic documents and videos into a percentage of the total electronic documents and videos the reporting entity specified	12.50%

Topic	Criteria	Conversion Approach	Weight
Miscellaneous	Q80 to Q89	• 100% = 1	2.50% each
		• 90%-99% = 0.9	
		• 50%-90% = 0.5	
		• Less than 50% = .25	
		• Unknown = 0	
		• N/A = 1	

The internet and intranet are essential and increasingly important mediums for digital commerce, communication, and collaboration across the federal government. Additionally, web testing methodologies and tools are much more mature than other ICT types, as noted by the number of web pages that reporting entities regularly test. In the development of the c-index, we placed slightly more emphasis on these areas relative to documents, videos, and other covered ICT. GSA and the Access Board are driving initiatives to develop best practices and guidance to standardize testing for other ICT, including software, hardware, and electronic documents. As reporting entities adopt and implement these standardized testing methodologies, GSA will work with OMB and the Access Board to modify Assessment criteria to more consistently evaluate ICT conformance. We also intend to adjust the c-index to incorporate expanded measurement of other types of ICT in addition to web content.

By converting and totaling reporting entity-specific responses to each criterion listed above, we determined a reporting entity-specific value for the m-index and c-index. Importantly, the c-index was rescaled by a factor of 4 to equal the scale of the m-index.

## Pre-Post Analysis

Two consecutive reporting periods, FY23 and FY24, provided us with the opportunity to gain insight into how Section 508 activities changed over time. Through pre-post analysis, we evaluated the impact of an intervention – in this case, the release of the FY23 Assessment – by measuring changes in relevant criteria and indices over time. We asked three broad questions.

**First, was there a meaningful change?** For a given research question, a p-value told us if a meaningful change occurred over the two reporting periods. For pre-post analysis, the p-value refers to the probability of observing a change when in fact no change between the two times occurred. A small p-value, typically less than 0.05, indicates the observed change is real and is deemed a

statistically significant difference between the two periods. However, the p-value can be statistically significant even for very small or near-significant changes, especially when the amount of data is large. Consequently, we factored in the amount of data when determining the magnitude of the change.

**Second, what was the magnitude of the change?** To determine the amount of change over FY23 and FY24, we used effect size, a measure that helped us understand the magnitude of a phenomenon or effect. The effect size took into account the impact of the sample size on the significance of the results. This was particularly useful when dealing with Likert scale data like m-index data, which lack inherent numerical meaning by themselves and only gains meaning when interpreted through the scale. For example, a score of 4 on a survey only gains meaning when contextualizing it on a scale ranging from 1 to 5.

We used the following standard categories for effect sizes: Small (0.1 to 0.3), Medium (0.3 to 0.5), and Large (0.5 to 0.9). These categories, expressed in terms of standard deviations, facilitated a more straightforward and standardized interpretation of results. However, because effect sizes represent absolute values and, as such, do not provide information about the direction of change, i.e., increase or decrease, we pursued further analysis to discern this aspect.

**Third, in which direction did the change occur? Did we see an increase or decrease?** We used mean and median values to determine the direction of change between FY23 and FY24. For example, if the difference was positive, it meant the results for a question in FY24 is higher than in FY23 and the response improved over the past year. On the other hand, if the difference was negative, it meant the results for a question in FY24 is lower than in FY23 and the response worsened over the past year. While no single test can answer all three questions, a combination of tests and confirmations can. We performed the below sequence of tests listed, further summarized in Table B3.

- **Normality Assessment:** We used the Shapiro-Wilk test to evaluate normality, helping us identify whether the data was normally distributed or skewed. For comparisons used in our pre-post analysis, we expected a subset to exhibit normal distributions. However, only one out of approximately 100 comparisons met the normality criteria, requiring us to adapt our approach.
- **Skewness:** Next, to examine the asymmetry, or lopsidedness, in our data distribution, we measured skewness. For pre-post analysis, we considered values between -0.5 and +0.5 as indicative of a symmetrical distribution.
- **Optional Pre-Test for Significance:** When the differences between groups are non-normal and asymmetric, we initially investigated statistical significance with the Sign test. We considered it a weak statistical test that sometimes shows statistical significance more than we would expect, even when the underlying differences are not substantial. Rather than rely on it as the

sole determinant of significance, we used it as an initial indicator and then followed up with the Wilcoxon signed-rank test (See 4A) to validate the results for non-normal and asymmetric data.

- **Test for Significance:**
  - **Wilcoxon signed-rank test (WSRT):** We focused on testing statistical significance. If the data was non-normal or ordinal, we applied this test.
  - **Paired t-test (PTT):** As an alternative, we considered the paired t-test for significance when dealing with normally distributed differences.
- **Effect Size:**
  - **Wilcoxon effect size test:** To quantify the magnitude of the effect of non-normal differences, we used the Wilcoxon effect size. This step allowed us to understand the practical significance of observed changes. Notably, effect sizes fell into three categories: small (0.1 to 0.3), medium (0.3 to 0.5), and large (0.5 to 0.9).
  - **Cohen's D test:** To quantify the magnitude of the effect of normal, bell-shaped differences, we used Cohen's D test. This step allowed us to understand the practical significance of observed changes. We applied the same standard categories for effect size as we did for the Wilcoxon test.

**Table B3. Summary of Pre-Post Analysis Approach**

Order	Purpose	Name of Test	Conditions	Comments
1	Test for normalcy	Shapiro-Wilk test	N/A	N/A
2	Test for asymmetry	Skewness	N/A	Values between -0.5 to 0.5 denote approximate symmetry <sup>38</sup>
3	Pre-test for statistical significance	Sign test	Use if differences are non-normal and asymmetric	Follow up with Wilcoxon signed-rank test
4A	Test for statistical significance	Wilcoxon signed-rank test	Use if differences are non-normal or if data is ordinal	N/A
4B	Test for statistical significance	Paired t-test	Use if differences are normal	N/A

<sup>38</sup> A 0 denotes perfect symmetry or normal distribution of differences, which should be a rare outcome given our data.



Order	Purpose	Name of Test	Conditions	Comments
5A	Effect size	Wilcoxon effect size test	Use if differences are non-normal or if data is ordinal	Expected range of values –
				<ul style="list-style-type: none"> <li>• Small (0.1 to 0.3),</li> <li>• Medium (0.3 to 0.5), and</li> <li>• Large (0.5 to 0.9)</li> </ul>
5B	Effect size	Cohen's D test	Use if differences are normal	Expected range of values –
				<ul style="list-style-type: none"> <li>• Small (0.1 to 0.3),</li> <li>• Medium (0.3 to 0.5), and</li> <li>• Large (0.5 to 0.9)</li> </ul>

A probability value (p-value) helps us determine whether the difference we observe between two groups is real or just due to chance. It tells us how likely it is that we would observe these results if there were no real difference at all. The lower the p-value, the stronger the evidence that the difference is meaningful and not due to random chance. A low p-value of typically 0.05 or less suggests the difference is meaningful and not just random, while a high p-value greater than 0.05 suggests the difference might be due to chance, and we lack enough evidence to say it is statistically significant. We notate the extent of statistical significance as summarized by Table C4.

**Table B4. Summary of Statistical Significance Notation**

Meaning	Description	Notation
<b>P &gt; 0.05</b>	not significant	ns
<b>P ≤ 0.05</b>	statistically significant	*
<b>P ≤ 0.01</b>	highly statistically significant	**
<b>P ≤ 0.001</b>	very highly statistically significant	***
<b>P ≤ 0.0001</b>	extremely statistically significant	****

Throughout this report, we present mean values or averages to provide a straightforward understanding of YOY changes in the Section 508 landscape. However, since the data distribution was often non-normal, we used the Wilcoxon signed-rank test to evaluate statistical significance by assessing median differences. While averages are presented in the text for ease of interpretation, the Wilcoxon test offers a robust analysis by accounting for non-normality. Therefore, when the Wilcoxon signed-rank test indicates statistical significance, it reflects changes in the median, even if mean values are reported for simplicity.

## Regression Analysis

Regression analysis helps explore the relationships between independent variables and Section 508 compliance outcomes. For FY24, we conducted [22 regressions](#) using both simple and multivariable models to explore which criteria, and to what extent, drive Section 508 program maturity and conformance. However, none of these regressions resulted in both a p-value below the threshold for statistical significance (0.05) and a high R<sup>2</sup> value (above 0.75). This suggests that while the models captured relevant factors, other dynamics such as data quality issues persist or may have compounded, hindering efforts to isolate the specific drivers of Section 508 compliance.

Given the lack of statistically significant findings and the absence of high R<sup>2</sup> values, detailed regression methods and results are not included in this year's report. However, a condensed methodology is provided below and [full regression methods](#) and [earlier findings](#) remain available for reference in the previous year's report.

A typical regression equation used in the analysis took the following form:

$$\text{Dependent Variable} = \beta_0 + \beta_1(\text{Independent Variable 1}) + \beta_2(\text{Independent Variable 2}) + \dots + \varepsilon$$

Where:

- $\beta_0$  is the intercept or value of the dependent variable if all independent variables are 0.
- $\beta_1, \beta_2, \dots$  are coefficients that describe the strength and direction of relationships between independent variables and the outcome.
- $\varepsilon$  accounts for unexplained factors.

## Time Fixed Effects

New to FY24, time fixed effects were incorporated to control for YOY influences. This approach helps regression models account for shifts between FY23 and FY24, isolating time-specific factors that might otherwise skew the results. For example:

$$\text{Dependent Variable} = \beta_0 + \beta_1(\text{Independent Variable 1}) + \gamma_1(\text{FY23}) + \gamma_2(\text{FY24}) + \epsilon$$

By including these time-specific effects, our analysis aimed to accurately capture the underlying relationships between independent and dependent variables without biases introduced by changes over time. Despite running eight regression models with time fixed effects using data from both FY23 and FY24, none produced results substantial enough to include in this year's [Findings](#).

## P-Values and R<sup>2</sup> Values

The key metrics we used to evaluate the regressions were:

- **P-value:** Indicates whether relationships are statistically significant, with values below 0.05 suggesting significance.
- **R<sup>2</sup>:** Measures how well the independent variables explain variation in the outcome. Values above 0.75 are ideal, though moderate values can still offer insights.

## Appendix C: Overview Data By Reporting Entity

Reporting entities are listed in alphabetical order beginning with Chief Financial Officer (CFO) Act departments and component reporting entities followed by independent reporting entities.<sup>1</sup> Due to similarities of some reporting entity names, respondent acronyms used in this report may be different than those used by the reporting entities.

Comprehensive submission data by reporting entity can be found at [Section508.gov under Annual Reports](#). In addition, a supplemental data dictionary details the Assessment criteria, answer selections, dependencies, “understanding content” and variable identifiers.

**Each reporting entity overview page contains self-reported data for the following:**

- Reporting entity seal or logo
- Reporting entity name
- Identification of parent agency, if applicable
- Overall Performance, consisting of:
  - **Maturity Bracket:** This measure of a reporting entity's Section 508 program maturity assesses responses to criteria across nine dimensions. All were multiple choice format, equally weighted, and scored as noted in Methods, Descriptive Analysis. This maturity bracket consists of an index using a scale from 0 to 5, with 0 representing very low and 5 representing very high maturity levels.
  - **Conformance Bracket:** This measure of a reporting entity's conformance metrics consists of an index using a scale from 0 to 5, with 0 representing very low and 5 representing very high conformance. This conformance index quantified select responses to 16 specific criteria in the conformance section of criteria which directly relate to quantifiable compliance outcomes. They were assigned numerical values and weighted as shown in Table B2.
  - Recommendations specific to the reporting entity overall performance bracket
  - Visual of where the reporting entity falls on the 5 x 5 matrix for maturity and conformance, with very low in the bottom left corner and very high in the top right corner. For entities with two years of data, there is a depiction of FY23 and FY24 results in the matrix.

**Table C1. Brackets and value range of maturity and conformance indices**

Bracket	Value Range
Very High	>4 to 5
High	>3 to 4
Moderate	>2 to 3
Low	>1 to 2
Very Low	0 to 1

<sup>1</sup> Reporting entity denotes a respondent to the Assessment. This report uses the term “reporting entity” rather than “agency” or “component” as traditionally defined because reporting entity Section 508 programs may be organized or function outside of these traditional definitions.

- Program Highlights show reporting entity responses to Questions 42, 44, and 50.
- Number of Section 508 program Contractor full time equivalents (FTEs).
- Number of Section 508 program Federal FTEs.
- Total number of reporting entity Section 508 program FTEs compared to the average of Section 508 FTEs among reporting entity maturity dimension.
- Hours per week spent by the reporting entity Section 508 Program Manager (PM) compared to average Section 508 PM hours among reporting entity maturity dimension.
- Table comparing maturity outcomes for FY23 and FY24, averaged by dimension with five possible brackets:
  - Lowest and highest FY24 maturity dimensions are showcased with a double asterisk and a highlight in red denoting the lowest, and a single asterisk and a highlight in green denoting highest. Behind each bracket category is a numerical average of reporting entity responses. The lowest dimension highlighted does not imply this must be the first line of business the reporting entity should invest in; it only depicts the lowest ranking. Entities should determine the best course of action for their investment in Section 508 compliance.
  - If a reporting entity did not perform dimension functions, a “^” is next to the dimension.
- "How Conformant is ICT?" shows responses of conformance levels for specific ICT products in Questions 80-89:
  - Unknown
  - N/A = Not Applicable
  - 100% = Conforms to 100% of applicable Section 508 requirements
  - 90% - 99% = Conforms to 90% - 99% of applicable Section 508 requirements
  - 50% - 90% = Conforms to 50% - 90% of applicable Section 508 requirements
  - < 50% = Conforms to less than 50% of applicable Section 508 requirements
- ICT Testing Outcomes compare FY23 and FY24 results of:
  - All internal and public internet web pages tested as part of standard business operation. Data shown represents the percentage of ICT tested that fully conforms to Section 508 standards, i.e., did not have any defects reported, Not Tested, or Not Applicable.
  - Top 10 viewed internal intranet web pages, public web pages, public electronic documents, and top five viewed videos. Reporting entities were asked to identify top viewed ICT and fully test each ICT and report defects identified by Section 508 standard. Data shown represents the percentage of ICT tested that fully conforms to Section 508 standards, i.e., did not have any defects reported, Not Tested due to lack of resources, or Not Applicable as entity does not have that type of ICT.

# Reporting Entity Table of Contents

Reporting entities are listed in alphabetical order beginning with CFO Act departments and components followed by independent reporting entities.

- [Department of Agriculture](#)
- [Department of Commerce](#)
- [Department of Defense](#)
- [Department of Education](#)
- [Department of Energy](#)
- [Department of Health and Human Services](#)
- [Department of Homeland Security](#)
- [Department of Housing and Urban Development](#)
- [Department of Justice](#)
- [Department of Labor](#)
- [Department of State](#)
- [Department of the Interior](#)
- [Department of the Treasury](#)
- [Department of Transportation](#)
- [Department of Veterans Affairs](#)
- [Environmental Protection Agency](#)
- [General Services Administration](#)
- [National Aeronautics and Space Administration](#)
- [National Science Foundation](#)
- [Nuclear Regulatory Commission](#)
- [Office of Personnel Management](#)
- [Small Business Administration](#)
- [Social Security Administration](#)
- [U.S. Agency for International Development](#)
- [Independent Reporting Entities](#)

# Department of Agriculture

---

- Department of Agriculture (USDA)
- Agricultural Marketing Service (AMS)
- Agricultural Research Service (ARS)
- Animal and Plant Health Inspection Service (APHIS)
- Commodity Credit Corporation (CCC)
- Economic Research Service (ERS)
- Farm Production and Conservation (FPC)
- Farm Service Agency (FSA)
- Federal Crop Insurance Corporation (FCIC)
- Food and Nutrition Service (FNS)
- Food Safety and Inspection Service (FSIS)
- Foreign Agricultural Service (FAS)
- Forest Service (USFS)
- National Agricultural Statistics Service (NASS)
- National Institute of Food and Agriculture (NIFA)
- Natural Resources Conservation Service (NRCS)
- Risk Management Agency (RMA)
- Rural Business-Cooperative Service (RBCS)
- Rural Development (RD)
- Rural Housing Service (RHS)
- Rural Utilities Service (RUS)

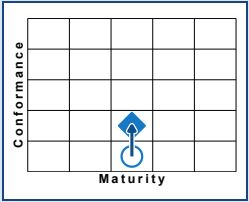


Overall Performance

Maturity: Moderate | Conformance: Low

Recommendations for Moderate Maturity, Low Conformance:

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 9  
FTEs for Moderate  
Maturity respondents

40 Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	Moderate	Low
Communications	High	Low
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership	High	Moderate
Technology Lifecycle Activities	Low	Moderate
Testing and Validation**	Low	Low
Acquisition and Procurement	High	High
Training*	Very High	Very High

\* Highest in FY24    \*\* Lowest in FY24  
^ does not perform dimension function

How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% - 99%	<50%	<50%	50% - 90%	50% - 90%	90% - 99%	Unknown	<50%	90% - 99%	50% - 90%

ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	100% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested



# Agricultural Marketing Service

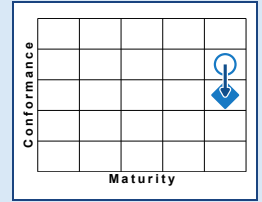
Department of Agriculture

## Overall Performance

**Maturity: Very High | Conformance: Moderate**

**Recommendations for Very High Maturity, Moderate Conformance:**

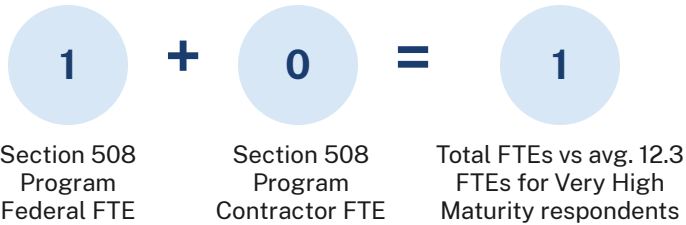
Those in the Very High-Low overall performance category should invest in testing efforts and resource allocation in order to improve their testing consistency and conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 35 hours for Very High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Very High	High
Communications*	Very High	Very High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership**	Very High	High
Technology Lifecycle Activities*	Very High	Very High
Testing and Validation	Very High	Very High
Acquisition and Procurement*	Very High	Very High
Training*	Very High	Very High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	90% -99%	90% -99%	100%	100%	90% -99%	90% -99%	100%	90% -99%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	89% fully conform	100% fully conform	FY24	0% fully conform	0% fully conform	0% fully conform	100% fully conform
FY23	85% fully conform	88% fully conform	FY23	0% fully conform	100% fully conform	40% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-6

# Agricultural Research Service

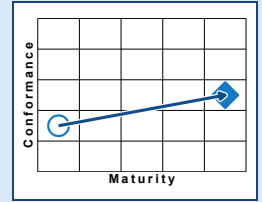
Department of Agriculture

## Overall Performance

**Maturity: Very High | Conformance: Moderate**

**Recommendations for Very High Maturity, Moderate Conformance:**

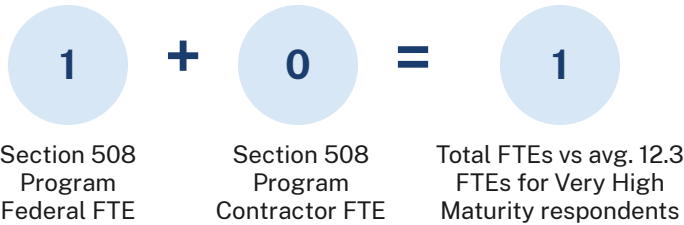
Those in the Very High-Low overall performance category should invest in testing efforts and resource allocation in order to improve their testing consistency and conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 35 hours for Very High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	Moderate
Policies, Procedures & Practices	Very High	Very Low
Communications*	Very High	Very Low
Content Creation**	Low	Very Low
Human Capital, Culture, & Leadership	High	Very Low
Technology Lifecycle Activities	Very High	Very Low
Testing and Validation	Very High	Very Low
Acquisition and Procurement*	Very High	Low
Training	Very High	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	N/A	N/A	90% -99%	50% -90%	90% -99%	N/A	N/A	90% -99%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	75% fully conform	80% fully conform	FY24	60% fully conform	50% fully conform	0% fully conform	0% fully conform
FY23	Not Tested	Not Tested	FY23	100% fully conform	Not Applicable	Not Tested	Not Tested



# Animal and Plant Health Inspection Service

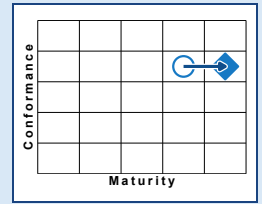
Department of Agriculture

## Overall Performance

**Maturity: Very High | Conformance: High**

### Recommendations for Very High Maturity, High Conformance:

Those in the Very High-High overall performance category should continue to make incremental improvements particularly in their testing and remediation efforts due to the variability in conformance results.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 35 hours for Very High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	Very High
Policies, Procedures & Practices**	Moderate	Low
Communications	Very High	Moderate
Content Creation	Very High	Very High
Human Capital, Culture, & Leadership	Very High	Moderate
Technology Lifecycle Activities	Very High	High
Testing and Validation	Very High	Very High
Acquisition and Procurement	Very High	High
Training	Very High	Very High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90%-99%	90%-99%	90%-99%	100%	100%	N/A	90%-99%	100%	100%	90%-99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	90% fully conform	77% fully conform	FY24	0% fully conform	60% fully conform	30% fully conform	100% fully conform
FY23	85% fully conform	70% fully conform	FY23	0% fully conform	0% fully conform	100% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-8



# Commodity Credit Corporation

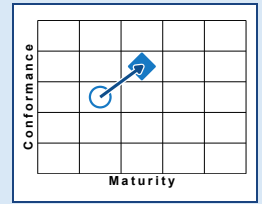
Department of Agriculture

## Overall Performance

**Maturity: Moderate | Conformance: High**

### Recommendations for Moderate Maturity, High Conformance:

Although overall performing moderately well in the Acquisition and Procurement maturity dimension, those in the Moderate-High overall performance category should continue to develop capabilities to verify the accessibility of contract deliverables as well as improving their Section 508 training planning and capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 9  
FTEs for Moderate  
Maturity respondents

**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Moderate	Low
Communications	Low	Low
Content Creation	High	Very Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities**	Very Low	Very High
Testing and Validation	Low	Very Low
Acquisition and Procurement*^	Very High	Very High
Training	Moderate	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	90% -99%	N/A	100%	N/A	N/A	N/A	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Not Tested	FY24	Not Applicable	Not Applicable	Not Applicable	Not Applicable
FY23	Not Tested	Not Tested	FY23	Not Applicable	Not Applicable	0% fully conform	Not Applicable

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

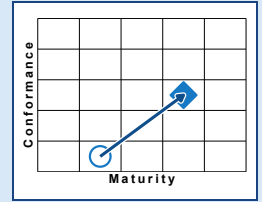
FY24 | C-9

## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

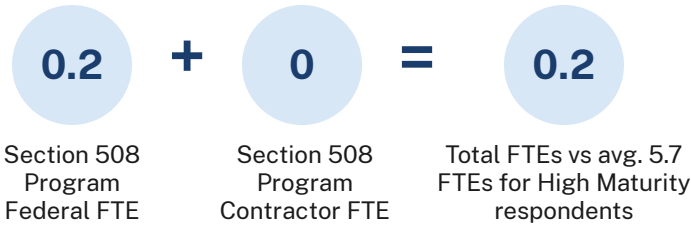
Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Low	Low
Policies, Procedures & Practices	Moderate	Moderate
Communications	Very High	Very Low
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership	Moderate	Very Low
Technology Lifecycle Activities	High	Very Low
Testing and Validation	Moderate	Low
Acquisition and Procurement*	Very High	Very High
Training	Moderate	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	90% - 99%	90% - 99%	90% - 99%	50% - 90%	100%	N/A	N/A	90% - 99%	90% - 99%

## ICT Testing Outcomes

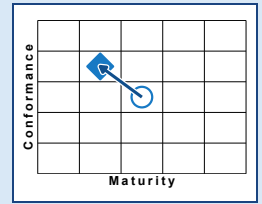
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	80% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	0% fully conform	0% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

## Overall Performance

**Maturity: Low | Conformance: High**

### Recommendations for Low Maturity, High Conformance:

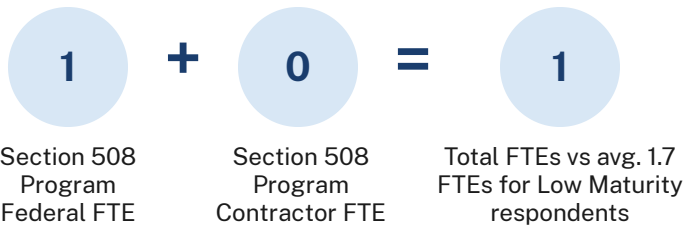
Those in the Low-High category should invest in improving tracking and remediation of nonconformant content across the enterprise as well as include digital accessibility in Human Capital, Culture, and Leadership efforts, particularly including ICT accessibility into DEIA and mission-related strategic efforts.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	High
Policies, Procedures & Practices	Low	Moderate
Communications	Low	Very Low
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Low	Low
Testing and Validation*	Moderate	High
Acquisition and Procurement	Low	Moderate
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	50%-90%	50%-90%	50%-90%	N/A	100%	N/A	N/A	N/A	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	40% fully conform	FY24	Not Applicable	0% fully conform	Not Applicable	Not Applicable
FY23	Not Tested	40% fully conform	FY23	Not Applicable	62.5% fully conform	100% fully conform	Not Applicable

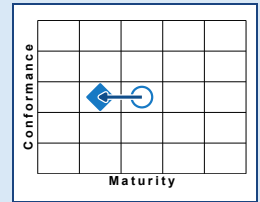


## Overall Performance

**Maturity: Low | Conformance: Moderate**

### Recommendations for Low Maturity, Moderate Conformance:

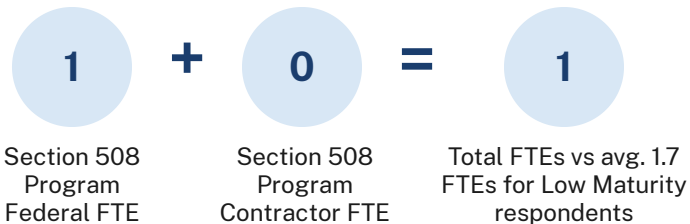
Those in the Low-Moderate overall performance category should continue to invest in establishing processes for creating accessible communications as well as addressing accessibility in acquisition within the entity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices	Low	Low
Communications	Low	Low
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Low	Low
Testing and Validation	Moderate	Moderate
Acquisition and Procurement	Low	Moderate
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	50% -90%	N/A	Unknown	N/A	100%	N/A	50% -90%	N/A	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	40% fully conform	FY24	Not Applicable	0% fully conform	66.7% fully conform	Not Applicable
FY23	Not Tested	34% fully conform	FY23	Not Applicable	10% fully conform	70% fully conform	Not Applicable

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-12



# Federal Crop Insurance Corporation

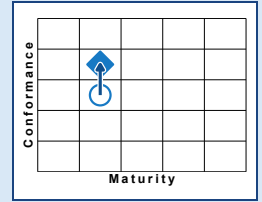
Department of Agriculture

## Overall Performance

**Maturity: Low | Conformance: High**

### Recommendations for Low Maturity, High Conformance:

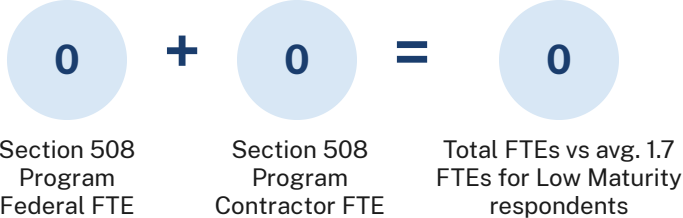
Those in the Low-High category should invest in improving tracking and remediation of nonconformant content across the enterprise as well as include digital accessibility in Human Capital, Culture, and Leadership efforts, particularly including ICT accessibility into DEIA and mission-related strategic efforts.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Never integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not have a formal technology development lifecycle



**40** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Very Low	Very Low
Communications**	Very Low	Very Low
Content Creation**	Very Low	Very Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	High	Very High
Testing and Validation	Low	Very Low
Acquisition and Procurement*^	Very High	Very High
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	50% - 90%	N/A	100%	N/A	N/A	N/A	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Not Tested	FY24	Not Applicable	Not Applicable	Not Applicable	Not Applicable
FY23	Not Tested	Not Tested	FY23	Not Applicable	Not Applicable	Not Tested	Not Applicable

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-13

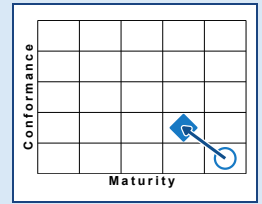


## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 5.7  
FTEs for High Maturity  
respondents

**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	High	High
Communications**	Low	Very High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	Moderate	High
Technology Lifecycle Activities	Very High	Very High
Testing and Validation	Very High	High
Acquisition and Procurement*	Very High	Very High
Training	High	Very High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	100%	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	100% fully conform	75% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	0% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested



# Food Safety and Inspection Service

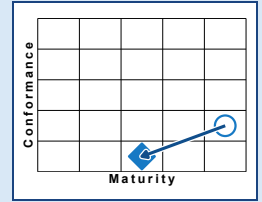
Department of Agriculture

## Overall Performance

**Maturity: Moderate | Conformance: Very Low**

**Recommendations for Moderate Maturity, Very Low Conformance:**

Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 9  
FTEs for Moderate  
Maturity respondents

**20** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Very High
Policies, Procedures & Practices	Moderate	Very High
Communications	Moderate	Very High
Content Creation*	High	Very High
Human Capital, Culture, & Leadership	Low	Very High
Technology Lifecycle Activities	Moderate	Very High
Testing and Validation	Moderate	Very High
Acquisition and Procurement**	Low	Very High
Training	High	Very High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	90% - 99%	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	70% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested



# Foreign Agricultural Service

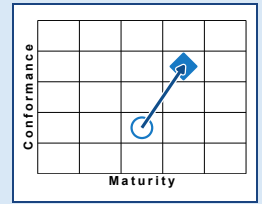
Department of Agriculture

## Overall Performance

**Maturity: High | Conformance: High**

### Recommendations for High Maturity, High Conformance:

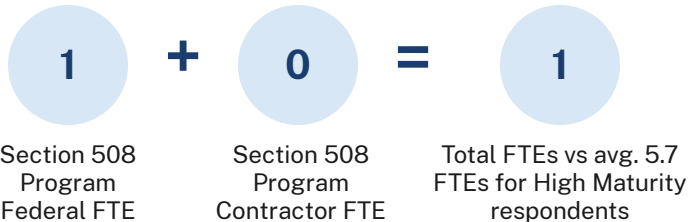
Those in the High-High overall performance category should consider a balanced approach to improving maturity, particularly around prioritizing risk in the technology development lifecycle.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**4** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices	Moderate	Very High
Communications**	Very Low	High
Content Creation	Low	Low
Human Capital, Culture, & Leadership	Low	Moderate
Technology Lifecycle Activities	Very High	Moderate
Testing and Validation	High	Low
Acquisition and Procurement*	Very High	Moderate
Training	High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	100%	100%	100%	100%	100%	N/A	Unknown	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	85% fully conform	FY24	Not Tested	70% fully conform	Not Applicable	Not Applicable
FY23	Not Tested	85% fully conform	FY23	Not Tested	60% fully conform	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-16

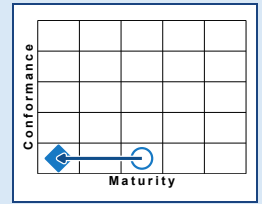


## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

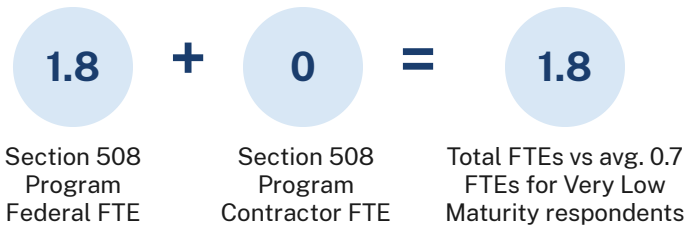
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Never integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	50% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested



# National Agricultural Statistics Service

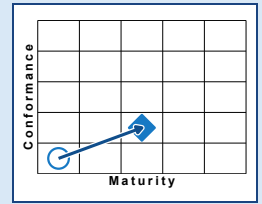
Department of Agriculture

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Never integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 9  
FTEs for Moderate  
Maturity respondents

0

Hours per week spent by 508 PM vs avg. 20.5  
hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices	High	Very Low
Communications	Very High	Moderate
Content Creation**	Very Low	Very Low
Human Capital, Culture, & Leadership	Moderate	Very Low
Technology Lifecycle Activities	Very Low	Moderate
Testing and Validation	Moderate	Very Low
Acquisition and Procurement*	Very High	Low
Training	Moderate	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	N/A	N/A	90% -99%	50% -90%	90% -99%	N/A	N/A	Unknown	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	0% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	80% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

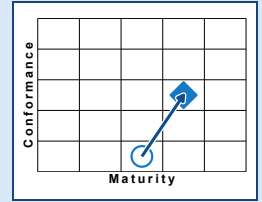


## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

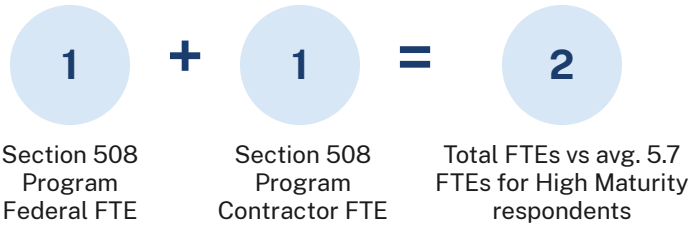
Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices	Low	Low
Communications	High	Moderate
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation	Very High	Very High
Acquisition and Procurement	High	High
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	N/A	N/A	90% -99%	50% -90%	90% -99%	N/A	N/A	90% -99%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	100% fully conform	FY24	Not Applicable	Not Tested	Not Tested	Not Tested
FY23	Not Tested	99% fully conform	FY23	Not Tested	0% fully conform	0% fully conform	Not Tested





# Natural Resources Conservation Service

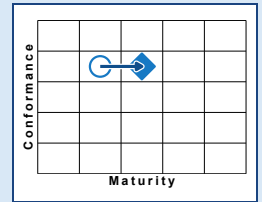
Department of Agriculture

## Overall Performance

**Maturity: Moderate | Conformance: High**

### Recommendations for Moderate Maturity, High Conformance:

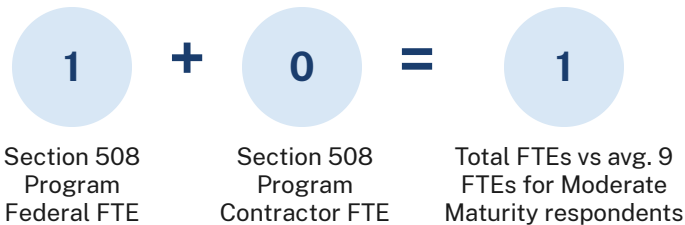
Although overall performing moderately well in the Acquisition and Procurement maturity dimension, those in the Moderate-High overall performance category should continue to develop capabilities to verify the accessibility of contract deliverables as well as improving their Section 508 training planning and capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	High	Moderate
Policies, Procedures & Practices	Low	Low
Communications	Low	Low
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Low	Low
Testing and Validation	Moderate	Moderate
Acquisition and Procurement	Moderate	Moderate
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	50%-90%	50%-90%	50%-90%	N/A	100%	N/A	Unknown	N/A	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	75% fully conform	FY24	Not Applicable	0% fully conform	Not Applicable	Not Applicable
FY23	Not Tested	57% fully conform	FY23	Not Applicable	50% fully conform	Not Applicable	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-20

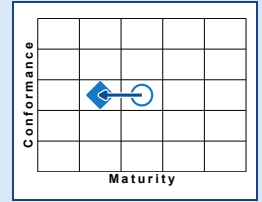


## Overall Performance

**Maturity: Low | Conformance: Moderate**

### Recommendations for Low Maturity, Moderate Conformance:

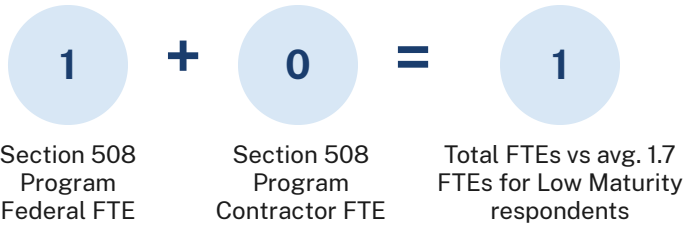
Those in the Low-Moderate overall performance category should continue to invest in establishing processes for creating accessible communications as well as addressing accessibility in acquisition within the entity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Moderate
Policies, Procedures & Practices	Low	Low
Communications	Low	Very Low
Content Creation	Moderate	High
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Low	Moderate
Testing and Validation*	Moderate	High
Acquisition and Procurement	Moderate	Moderate
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	50%-90%	N/A	50%-90%	N/A	N/A	N/A	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	22% fully conform	FY24	Not Applicable	0% fully conform	66.7% fully conform	Not Applicable
FY23	Not Tested	20% fully conform	FY23	Not Applicable	0% fully conform	Not Applicable	Not Applicable



# Rural Business- Cooperative Service

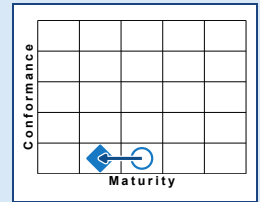
Department of Agriculture

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

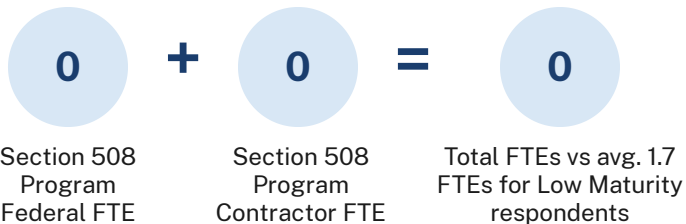
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Low
Policies, Procedures & Practices	Moderate	High
Communications*	High	High
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership**	Very Low	Low
Technology Lifecycle Activities	Low	Moderate
Testing and Validation	Low	Low
Acquisition and Procurement	Moderate	Low
Training**	Very Low	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-22

# Rural Development

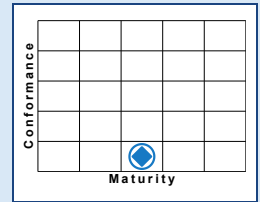
Department of Agriculture

## Overall Performance

**Maturity: Moderate | Conformance: Very Low**

**Recommendations for Moderate Maturity, Very Low Conformance:**

Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**3** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Low	Low
Policies, Procedures & Practices	High	High
Communications*	Very High	High
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	Moderate	Low
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation**	Low	Moderate
Acquisition and Procurement	High	Low
Training	Moderate	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50%-90%	50%-90%	50%-90%	50%-90%	90%-99%	100%	50%-90%	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	0% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested



# Rural Housing Service

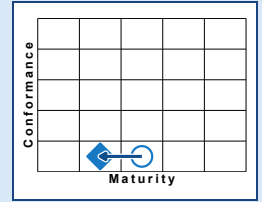
Department of Agriculture

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

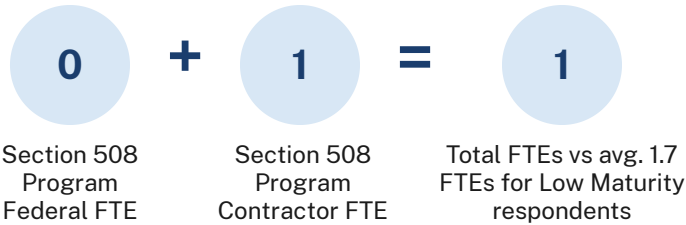
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Low
Policies, Procedures & Practices	Moderate	Very High
Communications*	High	High
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership**	Very Low	Low
Technology Lifecycle Activities	Low	Moderate
Testing and Validation	Low	Moderate
Acquisition and Procurement	Low	Low
Training	Moderate	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	0% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-24



# Rural Utilities Service

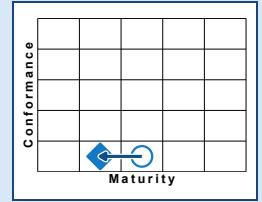
Department of Agriculture

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

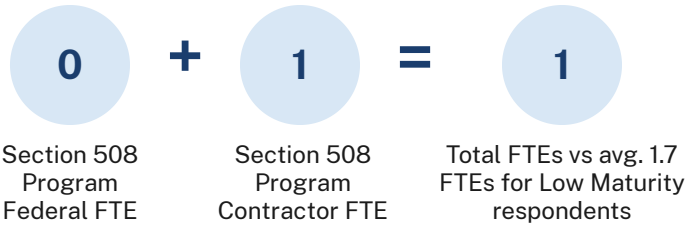
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Low
Policies, Procedures & Practices	Moderate	High
Communications*	Very High	High
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities**	Very Low	Moderate
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Low
Training	Moderate	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	0% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-25

## Department of Commerce

---

- Department of Commerce (DOC)
- Bureau of Economic Analysis (BEA)
- Bureau of Industry and Security (BIS)\*
- Bureau of the Census (CEN)
- Economic Development Administration (EDA)
- FirstNet Authority (FNA)
- International Trade Administration (ITA)
- Minority Business Development Agency (MBDA)\*
- National Institute of Standards and Technology (NIST)
- National Oceanic and Atmospheric Administration (NOAA)
- National Technical Information Service (NTIS)
- National Telecommunications and Information Administration (NTIA)
- U.S. Patent and Trademark Office (USPTO)

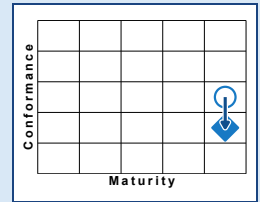
\*Entity only reported data in FY24

## Overall Performance

**Maturity: Very High | Conformance: Low**

### Recommendations for Very High Maturity, Low Conformance:

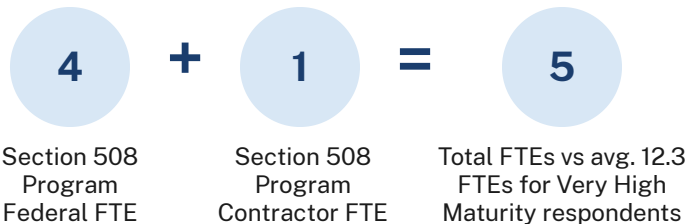
Those in the Very High-Low overall performance category should invest in testing efforts and resource allocation in order to improve their testing consistency and conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**20** Hours per week spent by 508 PM vs avg. 35 hours for Very High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Very High
Policies, Procedures & Practices**	Moderate	Very High
Communications*	Very High	Very High
Content Creation	High	Very High
Human Capital, Culture, & Leadership*	Very High	Very High
Technology Lifecycle Activities*	Very High	High
Testing and Validation*	Very High	Very High
Acquisition and Procurement*	Very High	High
Training	Moderate	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	Unknown	90% -99%	90% -99%	90% -99%	90% -99%	90% -99%	100%	100%	90% -99%

## ICT Testing Outcomes

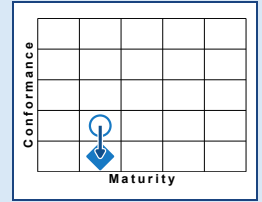
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	82% fully conform	FY24	Not Tested	0% fully conform	Not Tested	Not Tested
FY23	100% fully conform	100% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

## Overall Performance

**Maturity: Low | Conformance: Very Low**

**Recommendations for Low Maturity, Very Low Conformance:**

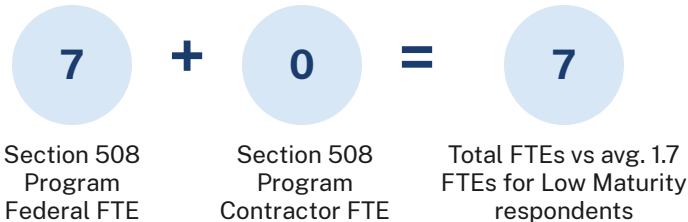
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**4** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Low
Policies, Procedures & Practices	Very Low	Very Low
Communications	Low	Low
Content Creation*	Very High	Moderate
Human Capital, Culture, & Leadership**	Very Low	Low
Technology Lifecycle Activities	Very Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement	Very Low	Moderate
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	N/A	Unknown	Unknown	Unknown	Unknown	Unknown	N/A	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	1% fully conform	FY24	0% fully conform	22.2% fully conform	0% fully conform	Not Tested
FY23	Not Tested	95% fully conform	FY23	Not Tested	20% fully conform	Not Tested	Not Applicable





# Bureau of Industry and Security

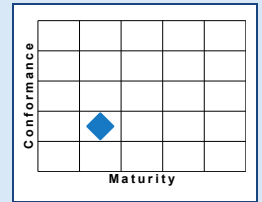
Department of Commerce

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

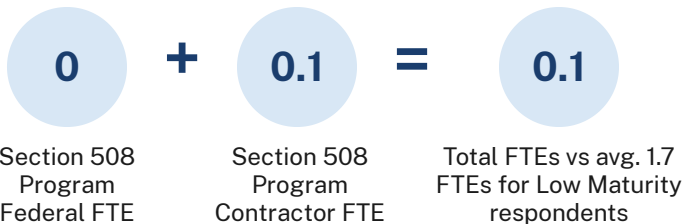
Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	No Data
Policies, Procedures & Practices	Very Low	No Data
Communications**	Very Low	No Data
Content Creation	Very Low	No Data
Human Capital, Culture, & Leadership**	Very Low	No Data
Technology Lifecycle Activities	Very Low	No Data
Testing and Validation	Low	No Data
Acquisition and Procurement*	High	No Data
Training	Very Low	No Data

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	Unknown	N/A	Unknown	Unknown	N/A	Unknown	100%	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	47% fully conform	FY24	Not Tested	40% fully conform	Not Tested	60% fully conform
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-29

# Bureau of the Census

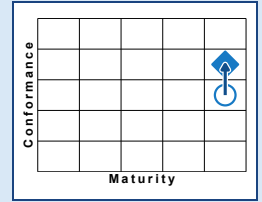
Department of Commerce

## Overall Performance

**Maturity: Very High | Conformance: High**

### Recommendations for Very High Maturity, High Conformance:

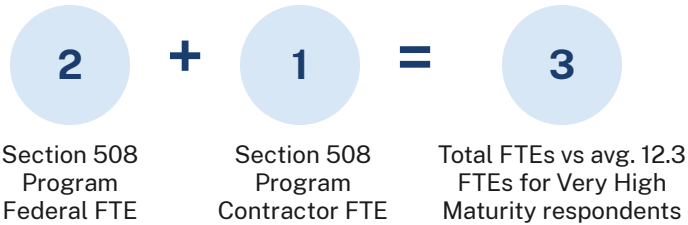
Those in the Very High-High overall performance category should continue to make incremental improvements particularly in their testing and remediation efforts due to the variability in conformance results.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 35 hours for Very High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	Very High
Policies, Procedures & Practices*	Very High	Very High
Communications*	Very High	High
Content Creation**	High	Very High
Human Capital, Culture, & Leadership**	High	High
Technology Lifecycle Activities	Very High	Very High
Testing and Validation	Very High	High
Acquisition and Procurement	Very High	High
Training	Very High	Very High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	90% -99%	90% -99%	90% -99%	90% -99%	90% -99%	100%	90% -99%	100%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	87% fully conform	88% fully conform	FY24	0% fully conform	0% fully conform	40% fully conform	100% fully conform
FY23	90% fully conform	80% fully conform	FY23	0% fully conform	Not Tested	Not Tested	Not Tested



# Economic Development Administration

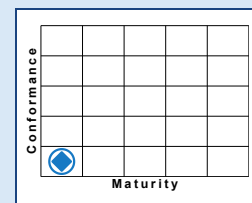
Department of Commerce

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

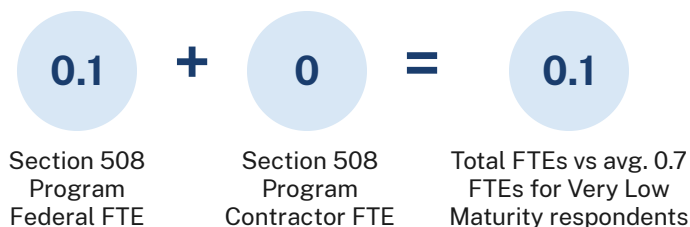
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Very Low
Policies, Procedures & Practices**	Very Low	Very Low
Communications**	Very Low	Very Low
Content Creation	Low	Very Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities**	Very Low	Moderate
Testing and Validation**	Very Low	Low
Acquisition and Procurement*	Low	Low
Training	Very Low	Very Low

\* Highest in FY24    \*\* Lowest in FY24  
^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	100%	N/A	100%	N/A	N/A

## ICT Testing Outcomes

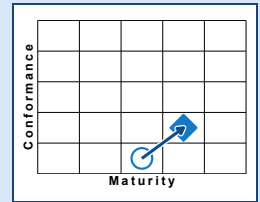
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	90% fully conform	FY23	Not Tested	Not Tested	0% fully conform	Not Tested

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

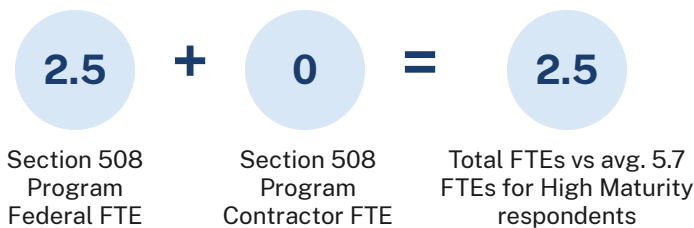
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Does not have a formal technology development lifecycle



**8** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices	Moderate	Low
Communications	Moderate	Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	Very High	Low
Technology Lifecycle Activities*^	Very High	Moderate
Testing and Validation*	Very High	High
Acquisition and Procurement	High	Moderate
Training**	Moderate	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	50% - 90%	100%	N/A	N/A	50% - 90%	N/A	Unknown	50% - 90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	2% fully conform	98% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	98% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

# International Trade Administration

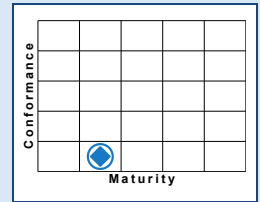
Department of Commerce

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

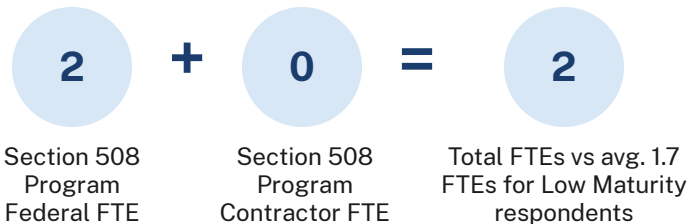
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Very Low
Policies, Procedures & Practices**	Very Low	Very Low
Communications	Low	Low
Content Creation	Low	Low
Human Capital, Culture, & Leadership*	Low	Moderate
Technology Lifecycle Activities	Low	Low
Testing and Validation*	Low	Low
Acquisition and Procurement	Low	Low
Training*	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	90% -99%	90% -99%	90% -99%	Unknown	Unknown	Unknown	100%	Unknown	Unknown

## ICT Testing Outcomes

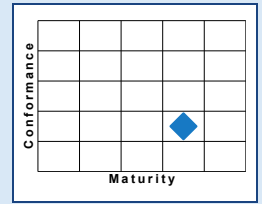
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	0% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	39% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

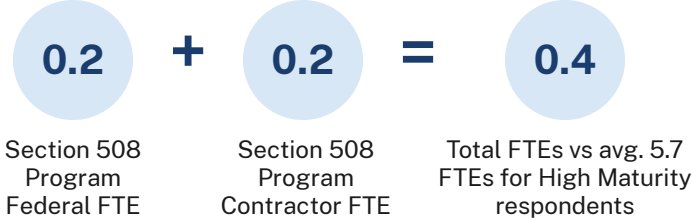
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**0.2** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	No Data
Policies, Procedures & Practices	Moderate	No Data
Communications**	Low	No Data
Content Creation	Moderate	No Data
Human Capital, Culture, & Leadership	High	No Data
Technology Lifecycle Activities	High	No Data
Testing and Validation*	Very High	No Data
Acquisition and Procurement	High	No Data
Training	High	No Data

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	100%	90% - 99%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Applicable	Not Tested	Not Tested	Not Tested
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data

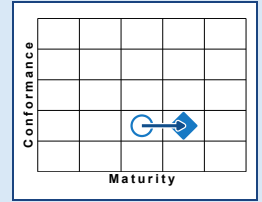


## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

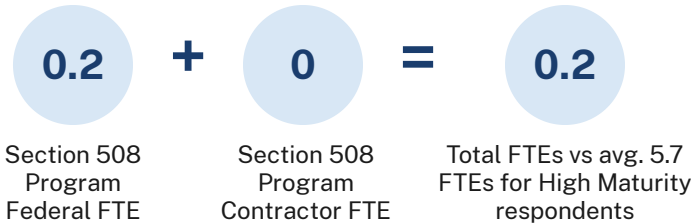
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**10** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Very High	Moderate
Communications*	Very High	Moderate
Content Creation	High	Very High
Human Capital, Culture, & Leadership	Moderate	Low
Technology Lifecycle Activities	Very High	Moderate
Testing and Validation**	Moderate	Moderate
Acquisition and Procurement	High	Moderate
Training	High	Low

\* Highest in FY24 \*\* Lowest in FY24  
^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% - 90%	90% - 99%	Unknown	90% - 99%	90% - 99%	100%	50% - 90%	Unknown	100%	50% - 90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	90% fully conform	Unknown	FY24	0% fully conform	0% fully conform	0% fully conform	100% fully conform
FY23	20% fully conform	66% fully conform	FY23	50% fully conform	0% fully conform	Not Tested	Not Tested



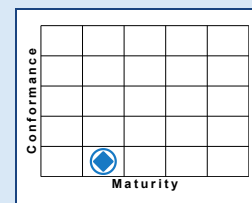
# National Oceanic and Atmospheric Administration

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

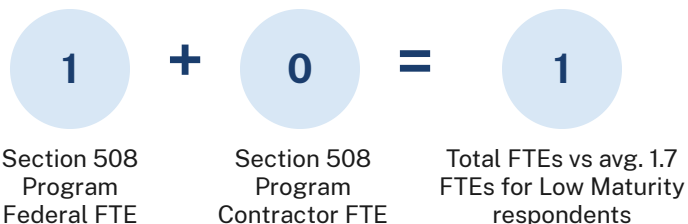
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Very Low
Policies, Procedures & Practices	Low	Very Low
Communications	Moderate	Very Low
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership	Low	Very Low
Technology Lifecycle Activities**	Very Low	High
Testing and Validation	Low	Low
Acquisition and Procurement	Moderate	High
Training*	High	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	50%-90%	N/A	100%	Unknown	50%-90%	50%-90%	Unknown

## ICT Testing Outcomes

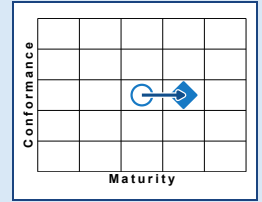
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	12% fully conform	FY24	Not Tested	30% fully conform	Not Tested	Not Tested
FY23	Not Tested	77% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

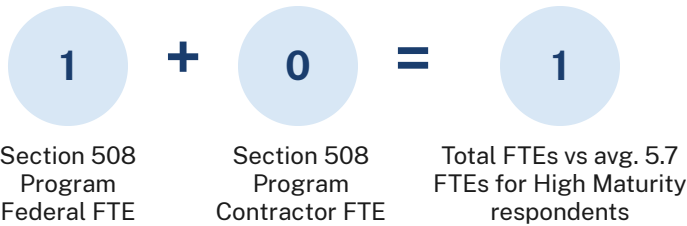
Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices**	Very Low	Low
Communications	Very High	Moderate
Content Creation	High	Low
Human Capital, Culture, & Leadership	High	Very Low
Technology Lifecycle Activities	Very High	High
Testing and Validation*	Very High	High
Acquisition and Procurement	Moderate	Moderate
Training	Low	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	100%	N/A	Unknown	100%	N/A	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	100% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	100% fully conform	100% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Applicable

# National Telecommunications and Information Administration

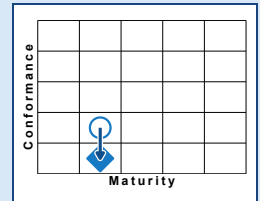
Department of Commerce

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

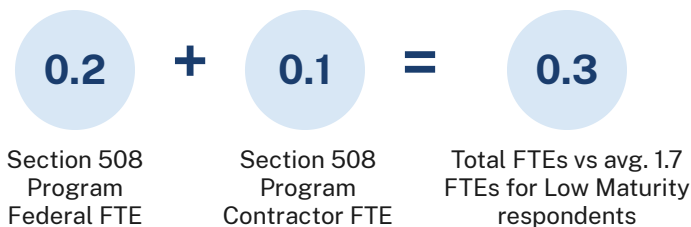
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**4** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Low
Policies, Procedures & Practices	Very Low	Very Low
Communications	Low	Very Low
Content Creation*	High	Very Low
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Low	Low
Testing and Validation	Moderate	High
Acquisition and Procurement	Moderate	Moderate
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50%-90%	Unknown	Unknown	100%	Unknown	90%-99%	50%-90%	90%-99%	50%-90%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	3% fully conform	FY24	Not Tested	0% fully conform	10% fully conform	Not Tested
FY23	Not Tested	78% fully conform	FY23	Not Tested	40% fully conform	Not Tested	100% fully conform

# U.S. Patent and Trademark Office

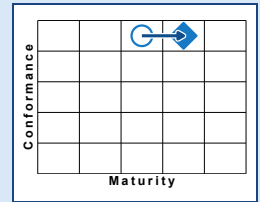
Department of Commerce

## Overall Performance

**Maturity: High | Conformance: Very High**

### Recommendations for High Maturity, Very High Conformance:

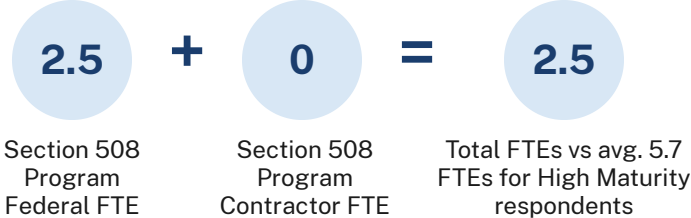
Those in the High-Very High overall performance category should consider a continuing process improvement that includes incremental improvements in the testing efforts and resourcing, while investing more in accessibility communication and Section 508 program efforts.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices	High	Moderate
Communications	High	Moderate
Content Creation*	High	Moderate
Human Capital, Culture, & Leadership	High	High
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation	High	Moderate
Acquisition and Procurement	High	Very High
Training**	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	90% - 99%	100%	90% - 99%	100%	90% - 99%	100%	100%	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	100% fully conform	100% fully conform	FY24	100% fully conform	100% fully conform	100% fully conform	100% fully conform
FY23	100% fully conform	100% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-39

# Department of Defense

- Department of Defense (DOD)
- Defense Acquisition University (DAU)
- Defense Advanced Research Projects Agency (DARPA)
- Defense Commissary Agency (DECA)
- Defense Contract Audit Agency (DCAA)
- Defense Contract Management Agency (DCMA)
- Defense Counterintelligence and Security Agency (DCSA)
- Defense Finance and Accounting Service (DFAS)
- Defense Health Agency (DHA)
- Defense Human Resources Activity (DHRA)
- Defense Information Systems Agency (DISA)
- Defense Intelligence Agency (DIA)
- Defense Logistics Agency (DLA)
- Defense Media Activity (DMA)
- Defense POW/MIA Accounting Agency (DPAA)
- Defense Security Cooperation Agency (DSCA)
- Defense Technical Information Center (DTIC)
- Defense Technology Security Administration (DTSA)\*
- Defense Threat Reduction Agency (DTRA)
- Department of the Air Force (USAF)
- Department of the Army (ARMY)
- Department of the Navy (NAVY)
- DOD Education Activity (DODEA)
- Joint Staff (JS)
- Missile Defense Agency (MDA)
- National Geospatial-Intelligence Agency (NGIA)
- National Guard Bureau (NGB)
- National Reconnaissance Office (NRO)
- National Security Agency/Central Security Service (NSA)
- Pentagon Force Protection Agency (PFPA)
- Washington Headquarters Services (WHS)

**Note:** National Defense University (NDU) reported in FY23 but not FY24. Office of Local Defense Community Cooperation (OLDCC) and Test Resource Management Center (TRMC) reported in FY23 but were not considered reporting entities per DOD for FY24.

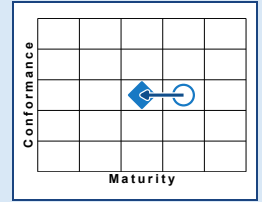
\*Entity only reported data in FY24

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

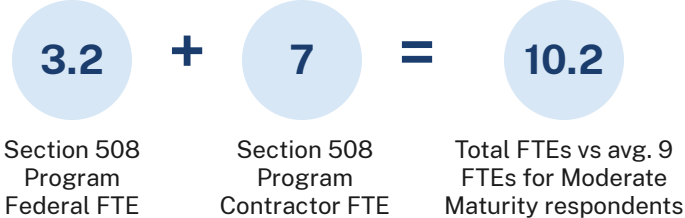
Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices	Moderate	High
Communications	Moderate	High
Content Creation	High	Very High
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities*	Very High	Moderate
Testing and Validation	High	High
Acquisition and Procurement**	Low	Very High
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	Unknown	Unknown	100%	90% -99%	100%	100%	100%	<50%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	70% fully conform	0% fully conform	FY24	10% fully conform	10% fully conform	80% fully conform	100% fully conform
FY23	10% fully conform	89% fully conform	FY23	0% fully conform	10% fully conform	90% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-41



# Defense Acquisition University

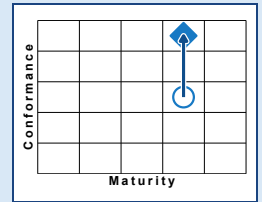
Department of Defense

## Overall Performance

**Maturity: High | Conformance: Very High**

### Recommendations for High Maturity, Very High Conformance:

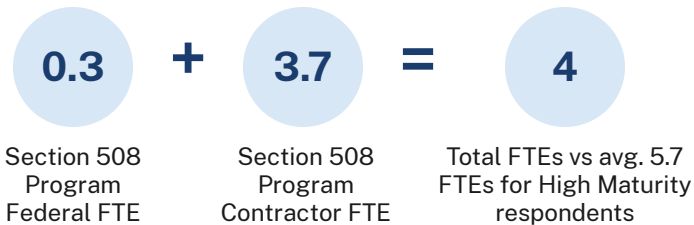
Those in the High-Very High overall performance category should consider a continuing process improvement that includes incremental improvements in the testing efforts and resourcing, while investing more in accessibility communication and Section 508 program efforts.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**12** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	Moderate
Communications*	Very High	Low
Content Creation	High	High
Human Capital, Culture, & Leadership**	Moderate	Moderate
Technology Lifecycle Activities	Very High	High
Testing and Validation	High	High
Acquisition and Procurement	Moderate	High
Training	Very High	Moderate

\* Highest in FY24 \*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	90% -99%	90% -99%	100%	90% -99%	100%	100%	100%	<50%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	60% fully conform	52% fully conform	FY24	90% fully conform	80% fully conform	100% fully conform	100% fully conform
FY23	20% fully conform	2% fully conform	FY23	20% fully conform	10% fully conform	30% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-42





# Defense Advanced Research Projects Agency

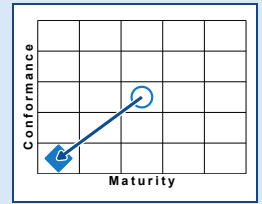
Department of Defense

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

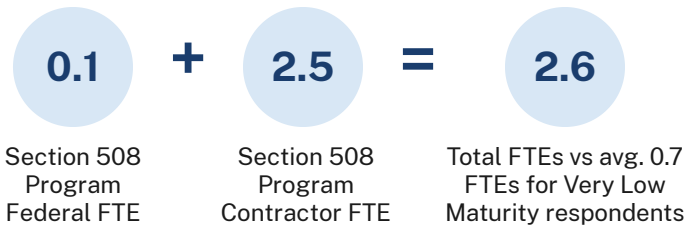
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Never integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**4** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Moderate	Moderate
Policies, Procedures & Practices**	Very Low	Very High
Communications**	Very Low	Low
Content Creation**	Very Low	Moderate
Human Capital, Culture, & Leadership**	Very Low	Moderate
Technology Lifecycle Activities	Very Low	High
Testing and Validation	Very Low	Moderate
Acquisition and Procurement**	Very Low	Moderate
Training	Very Low	Low

\* Highest in FY24 \*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	50% - 90%	Unknown	<50%	Unknown	Unknown	<50%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Not Tested	FY24	10% fully conform	0% fully conform	0% fully conform	Not Applicable
FY23	80% fully conform	80% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

# Defense Commissary Agency

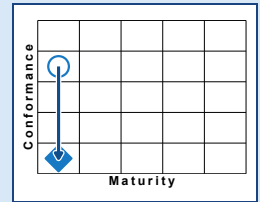
Department of Defense

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

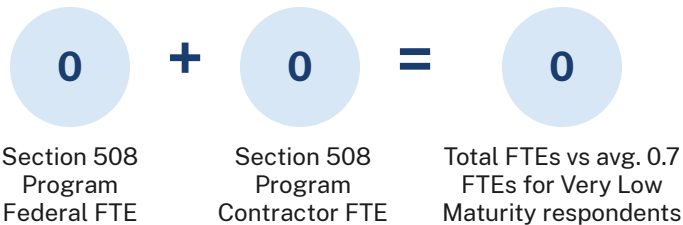
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Never integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is never integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Very Low	Very Low
Policies, Procedures & Practices**	Very Low	Low
Communications**	Very Low	Very Low
Content Creation**	Very Low	Very Low
Human Capital, Culture, & Leadership	Very Low	Low
Technology Lifecycle Activities**	Very Low	Very Low
Testing and Validation*	Very Low	Very Low
Acquisition and Procurement**	Very Low	Very Low
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	100%	Unknown	N/A	100%	Unknown	<50%	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Not Tested	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	0% fully conform	90% fully conform	FY23	100% fully conform	90% fully conform	100% fully conform	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-44

# Defense Contract Audit Agency

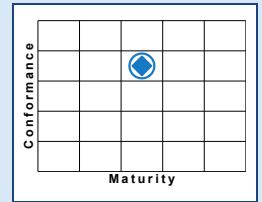
Department of Defense

## Overall Performance

**Maturity: Moderate | Conformance: High**

### Recommendations for Moderate Maturity, High Conformance:

Although overall performing moderately well in the Acquisition and Procurement maturity dimension, those in the Moderate-High overall performance category should continue to develop capabilities to verify the accessibility of contract deliverables as well as improving their Section 508 training planning and capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**8** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Moderate	Moderate
Communications*	High	Low
Content Creation**	Low	Low
Human Capital, Culture, & Leadership	Low	Moderate
Technology Lifecycle Activities	High	High
Testing and Validation	Low	Low
Acquisition and Procurement	Moderate	Moderate
Training	High	Very High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% -90%	N/A	N/A	100%	50% -90%	100%	N/A	90% -99%	90% -99%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	25% fully conform	0% fully conform	FY24	Not Applicable	0% fully conform	Not Applicable	Not Applicable
FY23	80% fully conform	80% fully conform	FY23	25% fully conform	0% fully conform	Not Applicable	Not Applicable

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-45

# Defense Contract Management Agency

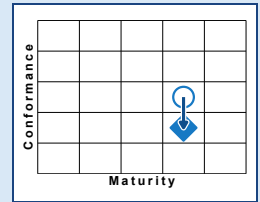
Department of Defense

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

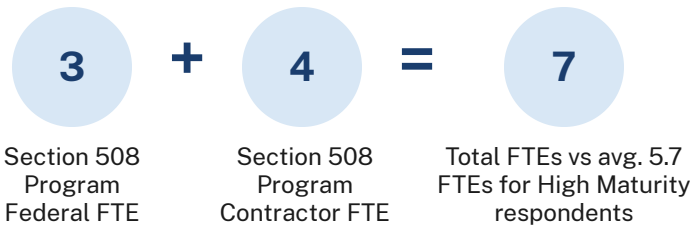
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	Very High
Policies, Procedures & Practices	Very High	Very High
Communications	Very High	Very High
Content Creation	Moderate	High
Human Capital, Culture, & Leadership	Very High	Very Low
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation**	Moderate	Moderate
Acquisition and Procurement	Moderate	Low
Training*	Very High	Very High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	90% -99%	50% -90%	100%	90% -99%	100%	100%	100%	<50%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	80% fully conform	0% fully conform	FY24	0% fully conform	10% fully conform	0% fully conform	0% fully conform
FY23	80% fully conform	90% fully conform	FY23	0% fully conform	0% fully conform	0% fully conform	0% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-46

# Defense Counterintelligence and Security Agency

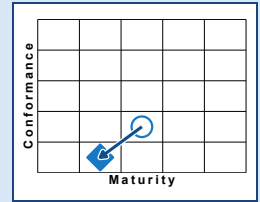
Department of Defense

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

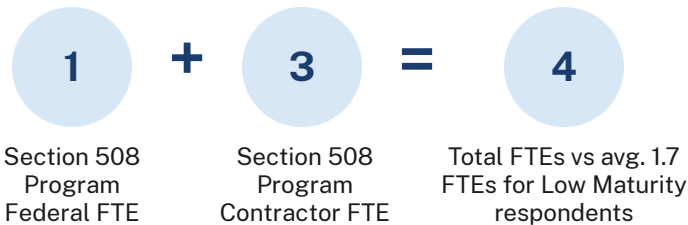
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Low	High
Communications	Low	Moderate
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership	Very Low	Moderate
Technology Lifecycle Activities*	Moderate	Low
Testing and Validation**	Very Low	Low
Acquisition and Procurement	Low	Low
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	100%	100%	100%	Unknown	100%	<50%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Not Tested	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	95% fully conform	FY23	Not Tested	100% fully conform	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-47

# Defense Finance and Accounting Service

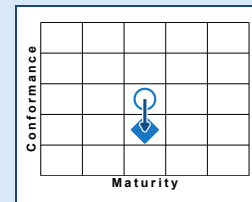
Department of Defense

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Moderate	High
Communications*	High	Moderate
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities	Moderate	Low
Testing and Validation	Low	Low
Acquisition and Procurement**	Very Low	Moderate
Training	High	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	100%	90%-99%	100%	Unknown	100%	N/A	100%	<50%	90%-99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	30% fully conform	Not Tested	FY24	60% fully conform	Not Tested	Not Tested	Not Tested
FY23	25% fully conform	95% fully conform	FY23	50% fully conform	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-48



# Defense Health Agency

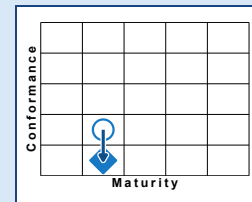
Department of Defense

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

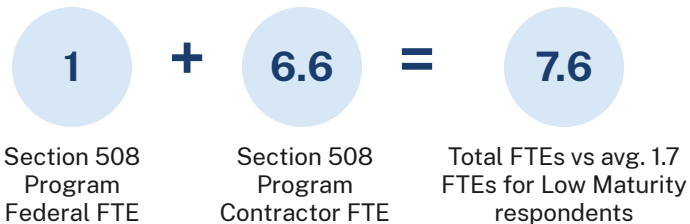
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices	Low	Moderate
Communications	Moderate	Moderate
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership**	Very Low	Low
Technology Lifecycle Activities	Very Low	Low
Testing and Validation	Moderate	Moderate
Acquisition and Procurement	Very Low	Very Low
Training*	High	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	Unknown	Unknown	100%	50%-90%	N/A	100%	100%	<50%	90%-99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	0% fully conform	FY24	0% fully conform	0% fully conform	10% fully conform	Not Tested
FY23	Not Tested	0% fully conform	FY23	Not Tested	33% fully conform	20% fully conform	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-49





# Defense Human Resources Activity

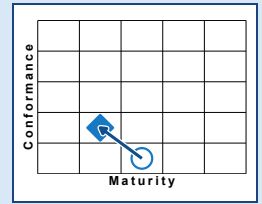
Department of Defense

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

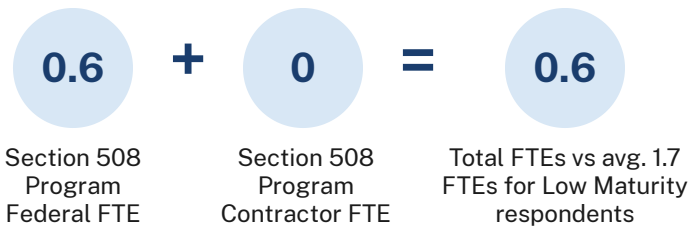
Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**24** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Low
Policies, Procedures & Practices	Moderate	Moderate
Communications	Low	Moderate
Content Creation*	High	High
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation	Moderate	Moderate
Acquisition and Procurement	Moderate	Moderate
Training**	Very Low	Low

\* Highest in FY24 \*\* Lowest in FY24  
^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	100%	Unknown	100%	Unknown	100%	<50%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	85% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	87% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-50



# Defense Information Systems Agency

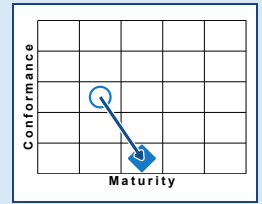
Department of Defense

## Overall Performance

**Maturity: Moderate | Conformance: Very Low**

**Recommendations for Moderate Maturity, Very Low Conformance:**

Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 9  
FTEs for Moderate  
Maturity respondents

**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Moderate
Policies, Procedures & Practices*	Very High	Moderate
Communications	High	Very Low
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities**	Very Low	Moderate
Testing and Validation	Moderate	Low
Acquisition and Procurement	Moderate	Moderate
Training	High	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	Unknown	Unknown	100%	Unknown	100%	100%	100%	<50%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	33% fully conform	79% fully conform	FY23	20% fully conform	30% fully conform	30% fully conform	Not Applicable

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-51

# Defense Intelligence Agency

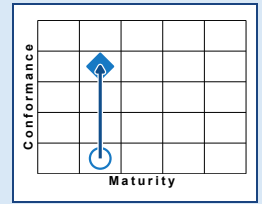
Department of Defense

## Overall Performance

**Maturity: Low | Conformance: High**

### Recommendations for Low Maturity, High Conformance:

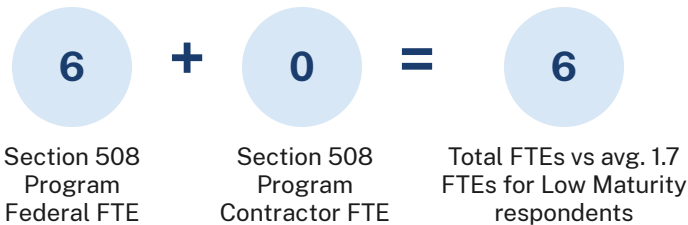
Those in the Low-High category should invest in improving tracking and remediation of nonconformant content across the enterprise as well as include digital accessibility in Human Capital, Culture, and Leadership efforts, particularly including ICT accessibility into DEIA and mission-related strategic efforts.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Moderate
Policies, Procedures & Practices	Low	Low
Communications*	High	Low
Content Creation	Low	Low
Human Capital, Culture, & Leadership	Low	Moderate
Technology Lifecycle Activities	Very Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement**	Very Low	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	Unknown	FY24	Not Applicable	Not Applicable	Not Applicable	Not Applicable
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-52



# Defense Logistics Agency

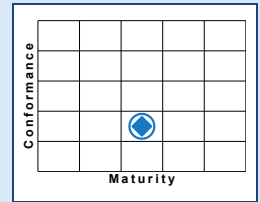
Department of Defense

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

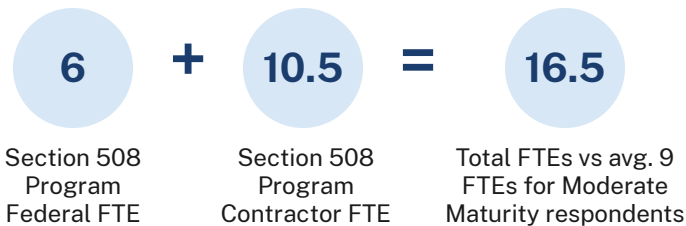
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Moderate
Policies, Procedures & Practices	Low	Moderate
Communications*	Very High	Very High
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership	High	Moderate
Technology Lifecycle Activities**	Low	Moderate
Testing and Validation	Moderate	High
Acquisition and Procurement	Moderate	Moderate
Training	Moderate	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50%-90%	100%	100%	100%	100%	100%	N/A	Unknown	<50%	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	14% fully conform	80% fully conform	FY24	0% fully conform	40% fully conform	0% fully conform	0% fully conform
FY23	14% fully conform	21% fully conform	FY23	0% fully conform	50% fully conform	0% fully conform	20% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-53

# Defense Media Activity

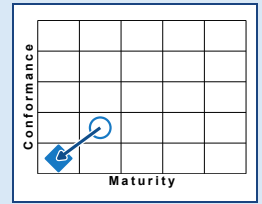
Department of Defense

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

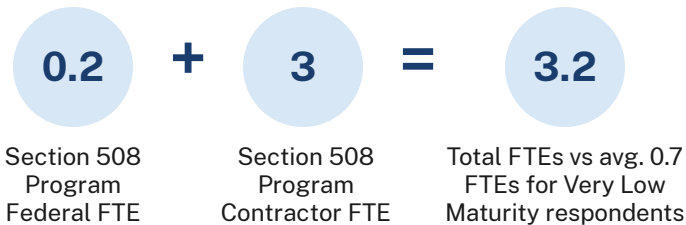
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is never integrated throughout technology development lifecycle activities.



1

Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices	Very Low	High
Communications**	Very Low	Very Low
Content Creation*	Low	Moderate
Human Capital, Culture, & Leadership	Very Low	Low
Technology Lifecycle Activities**	Very Low	Low
Testing and Validation	Low	Moderate
Acquisition and Procurement	Very Low	Low
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	100%	90%-99%	50%-90%	Unknown	Unknown	N/A	50%-90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	50% fully conform	FY24	Not Tested	20% fully conform	Not Tested	Not Tested
FY23	Not Tested	77% fully conform	FY23	Not Tested	0% fully conform	0% fully conform	0% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-54

# Defense POW/MIA Accounting Agency

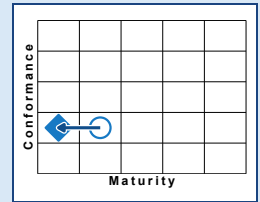
Department of Defense

## Overall Performance

**Maturity: Very Low | Conformance: Low**

### Recommendations for Very Low Maturity, Low Conformance:

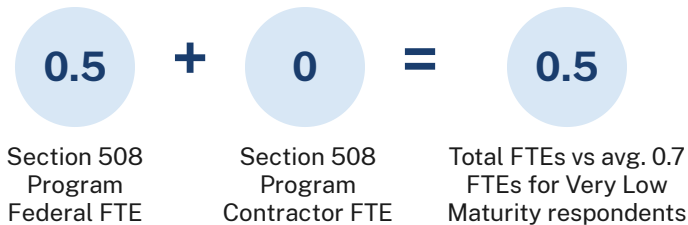
Those in the Very Low-Low overall performance category have several areas where they may invest to improve accessibility. However, as no reporting entity in this category had an established Section 508 program, fully establishing a Section 508 program would likely be a significant first step



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



1

Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Low
Policies, Procedures & Practices	Very Low	Moderate
Communications	Very Low	Very Low
Content Creation*	Low	Low
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Very Low	Low
Testing and Validation	Low	Very Low
Acquisition and Procurement*	Low	Very High
Training**	Very Low	Very Low

\* Highest in FY24    \*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	100%	Unknown	100%	100%	100%	<50%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Not Tested	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-55



# Defense Security Cooperation Agency

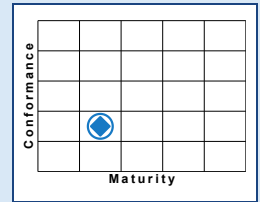
Department of Defense

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

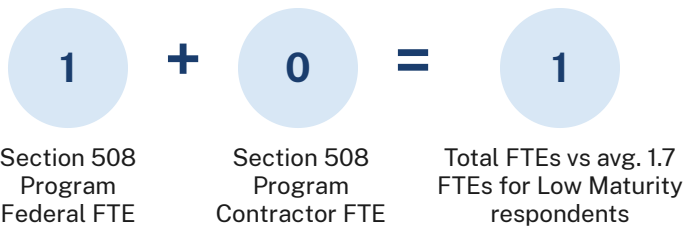
Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**10** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices	Low	Very High
Communications	Very Low	Very Low
Content Creation	Low	Very Low
Human Capital, Culture, & Leadership*	Moderate	Very Low
Technology Lifecycle Activities	Low	Moderate
Testing and Validation**	Very Low	Low
Acquisition and Procurement	Low	Low
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

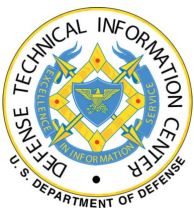
Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	100%	100%	100%	100%	100%	100%	100%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Not Tested	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	70% fully conform	FY23	Not Tested	100% fully conform	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-56





# Defense Technical Information Center

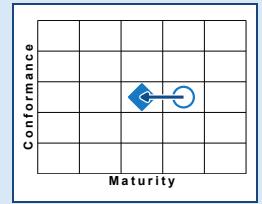
Department of Defense

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

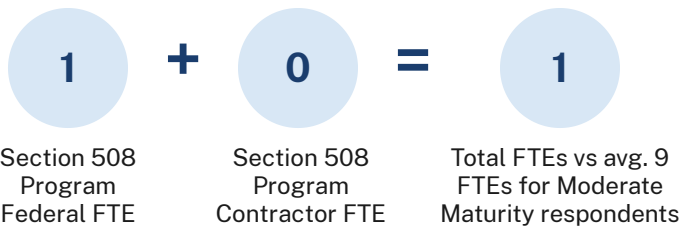
Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**15** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Moderate	Moderate
Communications*	High	High
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership	Moderate	High
Technology Lifecycle Activities	Low	Very High
Testing and Validation	Moderate	Very High
Acquisition and Procurement**	Low	Moderate
Training	High	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50%-90%	Unknown	50%-90%	100%	N/A	100%	100%	100%	<50%	90%-99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	50% fully conform	90% fully conform	FY24	10% fully conform	10% fully conform	50% fully conform	0% fully conform
FY23	Not Tested	99% fully conform	FY23	0% fully conform	10% fully conform	50% fully conform	Not Applicable

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-57



# Defense Technology Security Administration

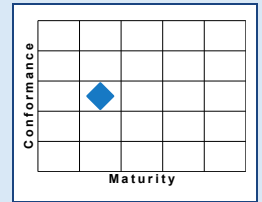
Department of Defense

## Overall Performance

**Maturity: Low | Conformance: Moderate**

### Recommendations for Low Maturity, Moderate Conformance:

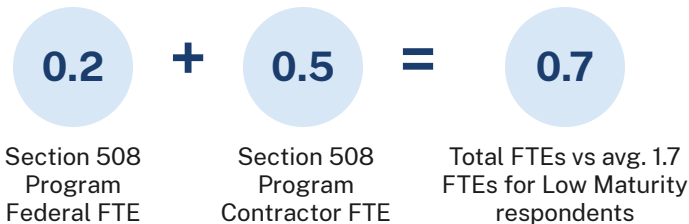
Those in the Low-Moderate overall performance category should continue to invest in establishing processes for creating accessible communications as well as addressing accessibility in acquisition within the entity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**1** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	No Data
Policies, Procedures & Practices	Low	No Data
Communications**	Very Low	No Data
Content Creation	Low	No Data
Human Capital, Culture, & Leadership**	Very Low	No Data
Technology Lifecycle Activities	Low	No Data
Testing and Validation*	Moderate	No Data
Acquisition and Procurement	Low	No Data
Training	Low	No Data

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	100%	N/A	100%	N/A	100%	<50%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	Unknown	FY24	Not Applicable	Not Tested	Not Tested	Not Applicable
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-58

# Defense Threat Reduction Agency

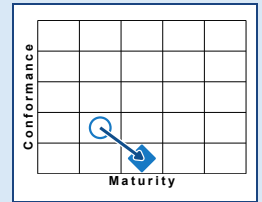
Department of Defense

## Overall Performance

**Maturity: Moderate | Conformance: Very Low**

**Recommendations for Moderate Maturity, Very Low Conformance:**

Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**30** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Low
Policies, Procedures & Practices	Moderate	Moderate
Communications	Moderate	Low
Content Creation*	High	Low
Human Capital, Culture, & Leadership*	High	Low
Technology Lifecycle Activities	Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Low
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	Unknown	Unknown	100%	90% - 99%	Unknown	50% - 90%	N/A	<50%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	87% fully conform	0% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-59

# Department of the Air Force

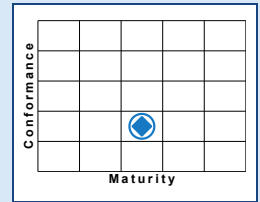
Department of Defense

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

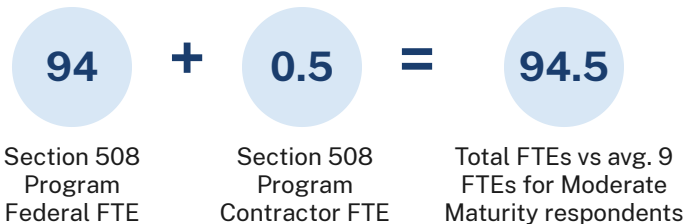
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**20** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	High
Policies, Procedures & Practices*	Very High	High
Communications**	Low	High
Content Creation	High	High
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities	High	High
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Moderate
Training	Moderate	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	100%	50%-90%	100%	100%	100%	<50%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	50% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	65% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-60

# Department of the Army

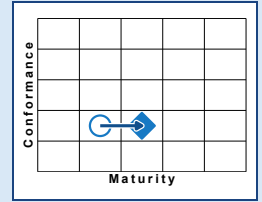
Department of Defense

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

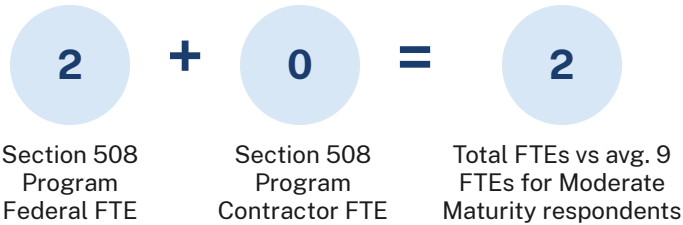
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Moderate	Moderate
Communications**	Low	Low
Content Creation**	Low	Moderate
Human Capital, Culture, & Leadership	High	Low
Technology Lifecycle Activities*	Very High	Very High
Testing and Validation	Low	Low
Acquisition and Procurement**	Low	Low
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	100%	90%-99%	Unknown	100%	Unknown	<50%	90%-99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	8% fully conform	FY24	Not Tested	10% fully conform	100% fully conform	Not Tested
FY23	Not Tested	100% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-61

# Department of the Navy

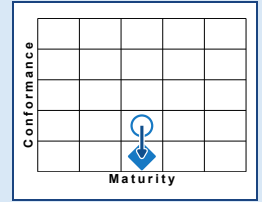
Department of Defense

## Overall Performance

**Maturity: Moderate | Conformance: Very Low**

### Recommendations for Moderate Maturity, Very Low Conformance:

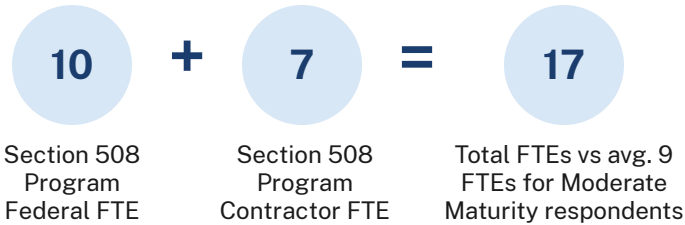
Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**25** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Low
Policies, Procedures & Practices	Moderate	High
Communications	Moderate	High
Content Creation**	Low	High
Human Capital, Culture, & Leadership	Low	High
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation	Low	Low
Acquisition and Procurement*	Moderate	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
<50%	<50%	<50%	100%	<50%	100%	100%	100%	100%	<50%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	0% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	67% fully conform	78% fully conform	FY23	0% fully conform	0% fully conform	14.% fully conform	Not Tested





# DOD Education Activity

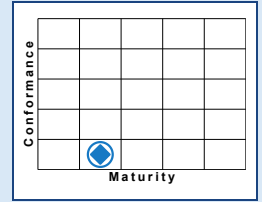
Department of Defense

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

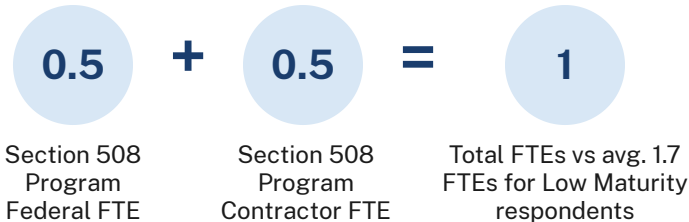
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**10** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Low
Policies, Procedures & Practices*	Moderate	Moderate
Communications	Moderate	Moderate
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership	Very Low	Low
Technology Lifecycle Activities	Very Low	Moderate
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Moderate
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	100%	Unknown	100%	<50%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested





# Joint Staff

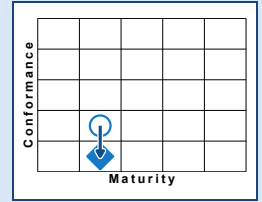
Department of Defense

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

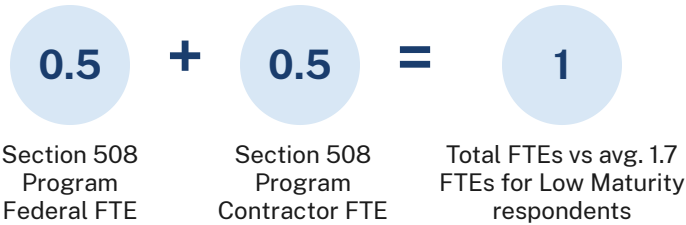
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**15** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices*	Moderate	Moderate
Communications**	Very Low	Low
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership	Very Low	Moderate
Technology Lifecycle Activities	Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement**	Very Low	Low
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	90% - 99%	90% - 99%	Unknown	N/A	Unknown	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-64

# Missile Defense Agency

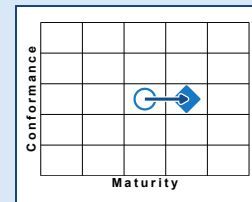
Department of Defense

## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.

1.5

+

0.7

=

2.2

Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 5.7  
FTEs for High Maturity  
respondents

**2.5** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	Low	High
Communications	Very High	Moderate
Content Creation*	Very High	Moderate
Human Capital, Culture, & Leadership	Moderate	Very High
Technology Lifecycle Activities	Very High	High
Testing and Validation	High	Moderate
Acquisition and Procurement	High	Moderate
Training**	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	100%	100%	100%	100%	100%	100%	<50%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	100% fully conform	50% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	100% fully conform	100% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

# National Geospatial-Intelligence Agency

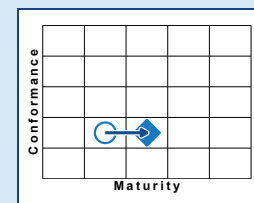
Department of Defense

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices*	High	Moderate
Communications	High	Low
Content Creation**	Low	Low
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities	Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% -90%	50% -90%	<50%	50% -90%	50% -90%	50% -90%	<50%	N/A	50% -90%	50% -90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	Not Tested	70% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-66



# National Guard Bureau

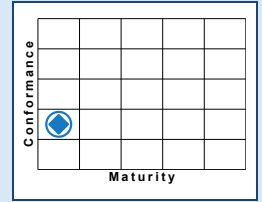
Department of Defense

## Overall Performance

**Maturity: Very Low | Conformance: Low**

### Recommendations for Very Low Maturity, Low Conformance:

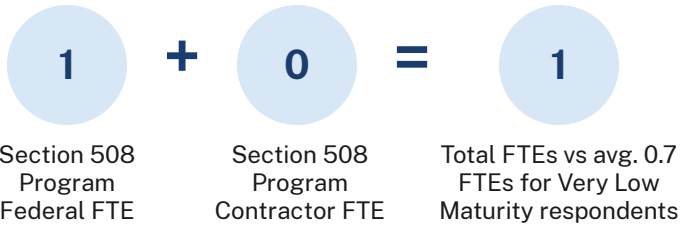
Those in the Very Low-Low overall performance category have several areas where they may invest to improve accessibility. However, as no reporting entity in this category had an established Section 508 program, fully establishing a Section 508 program would likely be a significant first step



◆ FY24 ○ FY23

## Program Highlights

- Q42: Does not know how Section 508 reviews are integrated into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Very Low
Policies, Procedures & Practices	Low	Moderate
Communications**	Very Low	Very Low
Content Creation**	Very Low	Very Low
Human Capital, Culture, & Leadership	Very Low	Low
Technology Lifecycle Activities**	Very Low	Very Low
Testing and Validation**	Very Low	Very Low
Acquisition and Procurement*	Moderate	Moderate
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	100%	Unknown	Unknown	Unknown	Unknown	<50%	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Applicable	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	100% fully conform

# National Reconnaissance Office

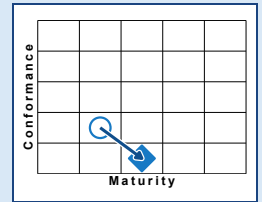
Department of Defense

## Overall Performance

**Maturity: Moderate | Conformance: Very Low**

### Recommendations for Moderate Maturity, Very Low Conformance:

Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	90%-99%	<50%	<50%	50%-90%	50%-90%	50%-90%	<50%	N/A	90%-99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Not Tested	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	100% fully conform	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-68

# National Security Agency/Central Security Service

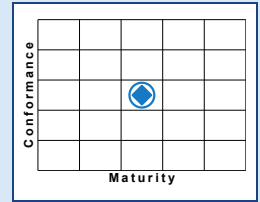
Department of Defense

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	High
Policies, Procedures & Practices	Moderate	High
Communications	Low	Low
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership	High	High
Technology Lifecycle Activities**	Very Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Low
Training	High	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	90% - 99%	50% - 90%	90% - 99%	<50%	100%	50% - 90%	100%	Unknown	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	10% fully conform	Unknown	FY24	Not Tested	100% fully conform	Not Tested	100% fully conform
FY23	Not Tested	1% fully conform	FY23	0% fully conform	90% fully conform	100% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-69



# Pentagon Force Protection Agency

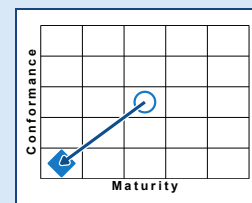
Department of Defense

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

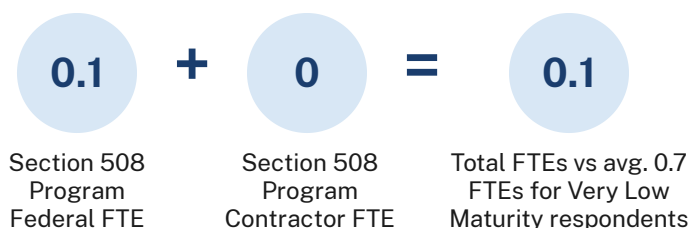
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Does not know how Section 508 reviews are integrated into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



1

Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Low	Low
Policies, Procedures & Practices**	Very Low	Moderate
Communications**	Very Low	High
Content Creation**	Very Low	Low
Human Capital, Culture, & Leadership**	Very Low	Low
Technology Lifecycle Activities	Very Low	Moderate
Testing and Validation**	Very Low	Very Low
Acquisition and Procurement	Very Low	High
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	0% fully conform	0% fully conform	FY23	0% fully conform	0%%	Not Applicable	Not Applicable



# Washington Headquarters Services

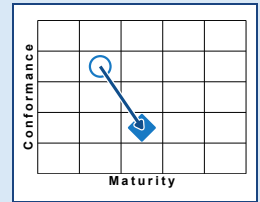
Department of Defense

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Does not have a formal technology development lifecycle



**24** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Low	Moderate
Communications	High	Moderate
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership**	Very Low	Low
Technology Lifecycle Activities*^	Very High	Very High
Testing and Validation	Moderate	Low
Acquisition and Procurement	Low	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	50% - 90%	90% - 99%	100%	50% - 90%	100%	100%	100%	<50%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	40% fully conform	70% fully conform	FY24	10% fully conform	10% fully conform	0% fully conform	20% fully conform
FY23	100% fully conform	100% fully conform	FY23	100% fully conform	100% fully conform	Not Tested	Not Applicable

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-71

# Department of Education

---

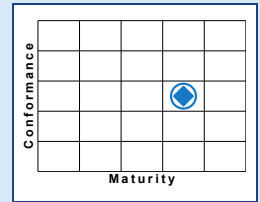
- Department of Education (ED)

## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

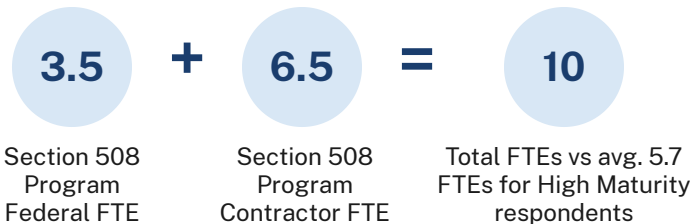
Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	Very High
Policies, Procedures & Practices**	High	High
Communications	Very High	Moderate
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	High	High
Technology Lifecycle Activities	High	Very High
Testing and Validation	High	High
Acquisition and Procurement	Very High	Very High
Training	High	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50%-90%	90%-99%	90%-99%	100%	90%-99%	100%	90%-99%	90%-99%	100%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	100% fully conform	Unknown	FY24	20% fully conform	40% fully conform	100% fully conform	40% fully conform
FY23	75% fully conform	0% fully conform	FY23	100% fully conform	20% fully conform	20% fully conform	100% fully conform

## Department of Energy

- Department of Energy (DOE)
- Bonneville Power Administration (BPA)
- National Nuclear Security Administration (NNSA)
- Office of Environment, Health, Safety and Security (EHSS)\*
- Southeastern Power Administration (SEPA)
- Southwestern Power Administration (SWPA)
- Western Area Power Administration (WAPA)

**Note:** Loan Programs Office (LPO), Office of Acquisition Management (OAM), Office of Electricity Delivery and Energy Reliability (OEDE), Office of Energy Efficiency and Renewable Energy (OEERE), and Office of Nuclear Safety Enforcement (ONSE) reported in FY23 but were not considered reporting entities per DOE for FY24.

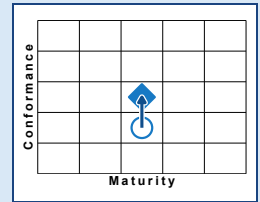
\*Entity only reported data in FY24

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

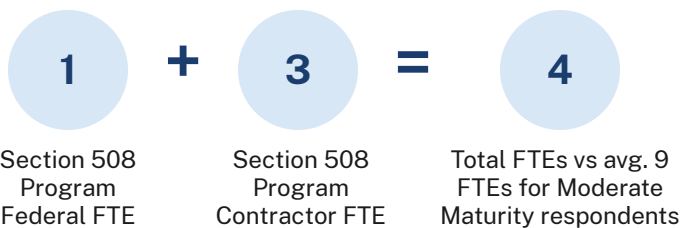
Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	High	Moderate
Policies, Procedures & Practices	Moderate	High
Communications	Low	Moderate
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership	High	Moderate
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation**	Low	Moderate
Acquisition and Procurement	High	High
Training	High	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	100%	100%	100%	50%-90%	90%-99%	90%-99%	90%-99%	90%-99%	50%-90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	48% fully conform	FY24	60% fully conform	80% fully conform	90% fully conform	0% fully conform
FY23	58% fully conform	1% fully conform	FY23	0% fully conform	0% fully conform	10% fully conform	20% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-75



# Bonneville Power Administration

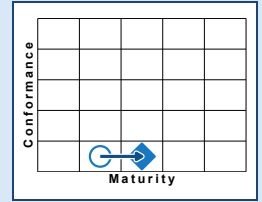
Department of Energy

## Overall Performance

**Maturity: Moderate | Conformance: Very Low**

**Recommendations for Moderate Maturity, Very Low Conformance:**

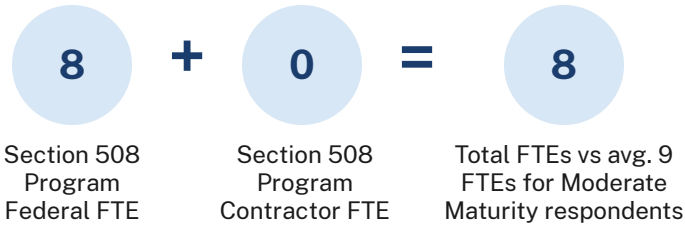
Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**20** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Low	Very Low
Policies, Procedures & Practices	Moderate	Low
Communications*	Very High	Low
Content Creation	High	Low
Human Capital, Culture, & Leadership	Low	Very Low
Technology Lifecycle Activities	Low	Low
Testing and Validation	Moderate	Low
Acquisition and Procurement	Moderate	Low
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	N/A	<50%	<50%	N/A	Unknown	90% -99%	N/A	<50%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	0% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-76

# National Nuclear Security Administration

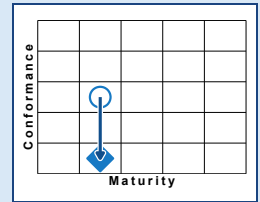
Department of Energy

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**10** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices*	Moderate	High
Communications**	Very Low	Very Low
Content Creation	Low	Low
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Low
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	90% - 99%	50% - 90%	N/A	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	66% fully conform	96% fully conform	FY23	100% fully conform	20% fully conform	40% fully conform	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-77





# Office of Environment, Health, Safety and Security

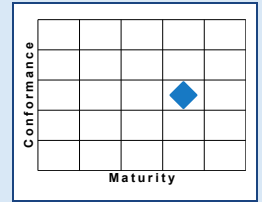
Department of Energy

## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

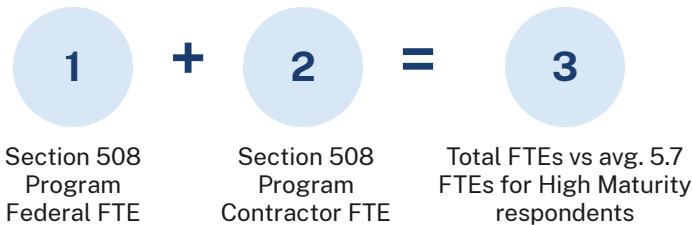
Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**5** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	No Data
Policies, Procedures & Practices	Moderate	No Data
Communications	Low	No Data
Content Creation*	Very High	No Data
Human Capital, Culture, & Leadership**	Very Low	No Data
Technology Lifecycle Activities	Very High	No Data
Testing and Validation	High	No Data
Acquisition and Procurement	Moderate	No Data
Training	High	No Data

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90%-99%	50%-90%	50%-90%	100%	N/A	90%-99%	100%	90%-99%	N/A	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	0% fully conform	FY24	0% fully conform	0% fully conform	100% fully conform	100% fully conform
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-78



# Southeastern Power Administration

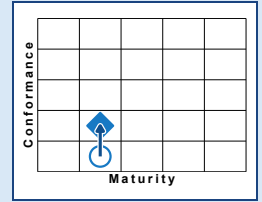
Department of Energy

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

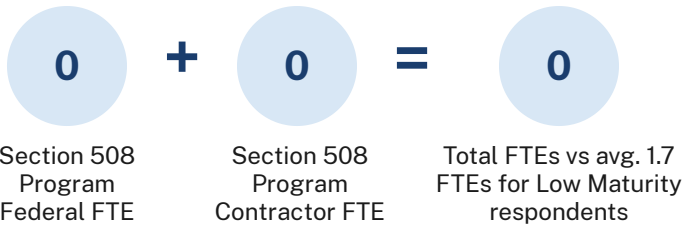
Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Never integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Does not have a formal technology development lifecycle



**0** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices**	Very Low	Low
Communications*^	Very High	Very Low
Content Creation**	Very Low	Very Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities*^	Very High	Very Low
Testing and Validation	Very Low	Low
Acquisition and Procurement**	Very Low	Low
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	100%	100%	100%	100%	N/A	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	19% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	21% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-79

# Southwestern Power Administration

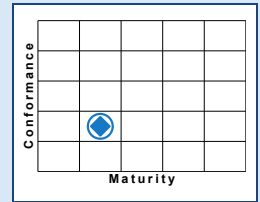
Department of Energy

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

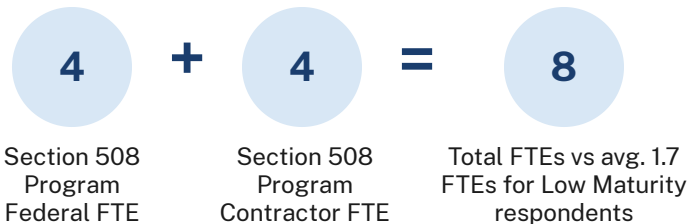
Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**20** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Low
Policies, Procedures & Practices	Very Low	Moderate
Communications*	Very High	Very Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Very Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement	Very Low	Very Low
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	Unknown	N/A	N/A	N/A	N/A	N/A	N/A

## ICT Testing Outcomes

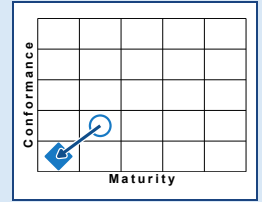
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	8% fully conform	92% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	9% fully conform	96% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

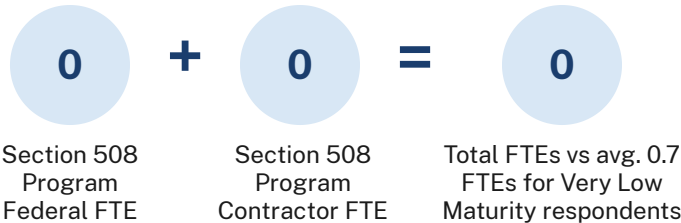
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is never integrated throughout technology development lifecycle activities.



0 Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Very Low	Very Low
Policies, Procedures & Practices	Low	Low
Communications	Very Low	Low
Content Creation	Very Low	Moderate
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Low	Low
Testing and Validation	Very Low	Low
Acquisition and Procurement	Low	Very Low
Training*	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50%-90%	100%	100%	100%	50%-90%	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	71% fully conform	FY23	Not Tested	100% fully conform	Not Tested	Not Tested

## Department of Health and Human Services

---

- Department of Health and Human Services (HHS)
- Administration for Children and Families (ACF)
- Administration for Community Living (ACL)
- Agency for Healthcare Research and Quality (AHRQ)
- Centers for Disease Control and Prevention (CDC)
- Centers for Medicare and Medicaid Services (CMS)
- Food and Drug Administration (FDA)
- Health Resources and Services Administration (HRSA)
- Indian Health Service (IHS)
- National Institutes of Health (NIH)
- Substance Abuse and Mental Health Services Administration (SAMHSA)

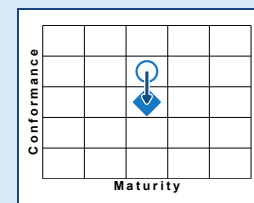
**Note:** Office of the Secretary (HHSOS) reported in FY23 but was combined into HHS's report for FY24.

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

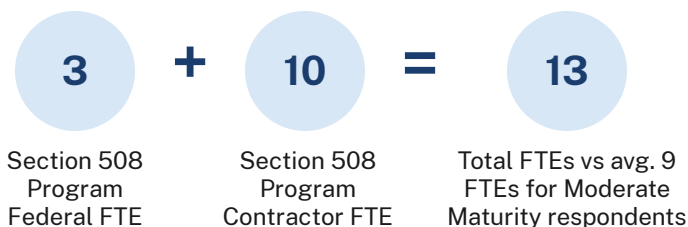
Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	Very High
Policies, Procedures & Practices	Very High	Very High
Communications**	Low	Low
Content Creation	Moderate	High
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities**	Low	Moderate
Testing and Validation	Moderate	High
Acquisition and Procurement	Low	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	50% - 90%	100%	100%	90% - 99%	100%	50% - 90%

## ICT Testing Outcomes

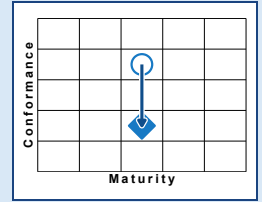
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	95% fully conform	FY24	90% fully conform	70% fully conform	80% fully conform	Not Tested
FY23	95% fully conform	94% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	Not Tested

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

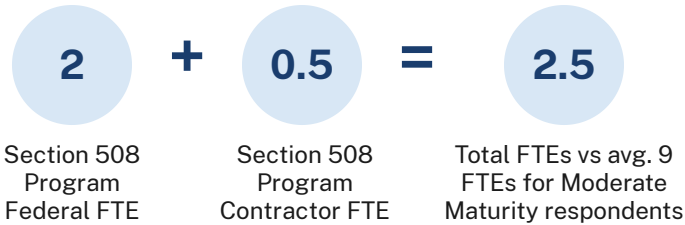
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices*	Very High	Very High
Communications	Low	High
Content Creation	Very High	High
Human Capital, Culture, & Leadership	Moderate	Low
Technology Lifecycle Activities	Moderate	Very High
Testing and Validation	Moderate	Moderate
Acquisition and Procurement**	Low	Low
Training	Moderate	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% -90%	50% -90%	Unknown	Unknown	50% -90%	100%	100%	Unknown	100%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	80% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	90% fully conform	100% fully conform	FY23	Not Tested	100% fully conform	Not Tested	100% fully conform

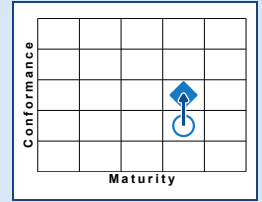


## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

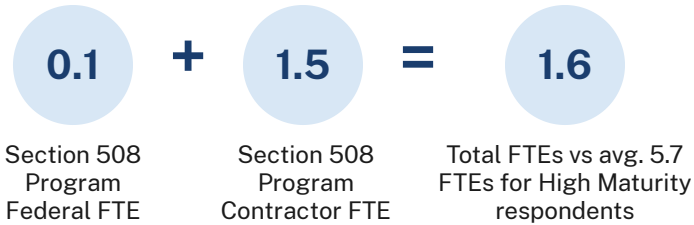
Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	Moderate
Policies, Procedures & Practices*	Very High	High
Communications	Moderate	Very High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership**	Low	Low
Technology Lifecycle Activities*	Very High	Very High
Testing and Validation	Very High	High
Acquisition and Procurement*	Very High	Very High
Training	High	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	Unknown	50%-90%	100%	N/A	100%	100%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	90% fully conform	FY24	Not Tested	50% fully conform	Not Tested	100% fully conform
FY23	Not Tested	95% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested



# Agency for Healthcare Research and Quality

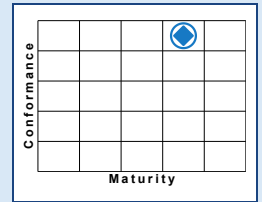
Department of Health and Human Services

## Overall Performance

**Maturity: High | Conformance: Very High**

### Recommendations for High Maturity, Very High Conformance:

Those in the High-Very High overall performance category should consider a continuing process improvement that includes incremental improvements in the testing efforts and resourcing, while investing more in accessibility communication and Section 508 program efforts.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 5.7  
FTEs for High Maturity  
respondents

8

Hours per week spent by 508 PM vs avg. 23  
hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	Moderate
Policies, Procedures & Practices*	Very High	Very High
Communications	Very Low	Very High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	High	Low
Technology Lifecycle Activities*	Very High	Very High
Testing and Validation*	Very High	Very High
Acquisition and Procurement	High	High
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% - 90%	50% - 90%	50% - 90%	50% - 90%	50% - 90%	100%	100%	50% - 90%	100%	<50%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	90% fully conform	91% fully conform	FY24	100% fully conform	100% fully conform	100% fully conform	100% fully conform
FY23	100% fully conform	87% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	100% fully conform



# Centers for Disease Control and Prevention

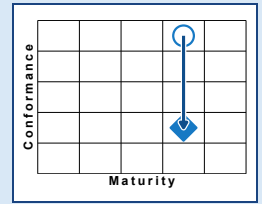
Department of Health and Human Services

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

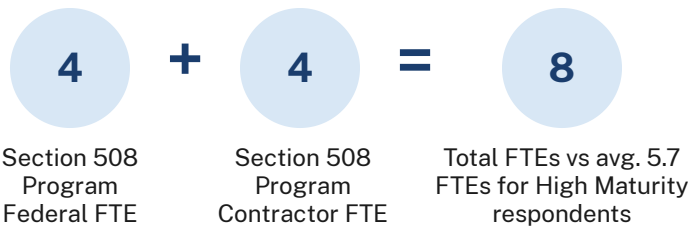
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	High
Policies, Procedures & Practices	High	High
Communications	High	Moderate
Content Creation	Very High	High
Human Capital, Culture, & Leadership**	Moderate	High
Technology Lifecycle Activities	High	Moderate
Testing and Validation	Very High	High
Acquisition and Procurement	High	Moderate
Training	Very High	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% - 90%	100%	90% - 99%	100%	50% - 90%	100%	100%	100%	90% - 99%	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	86% fully conform	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	68% fully conform	97% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	100% fully conform



# Centers for Medicare and Medicaid Services

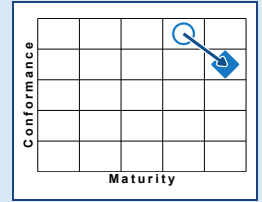
Department of Health and Human Services

## Overall Performance

**Maturity: Very High | Conformance: High**

### Recommendations for Very High Maturity, High Conformance:

Those in the Very High-High overall performance category should continue to make incremental improvements particularly in their testing and remediation efforts due to the variability in conformance results.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.

46.5

+

26

=

72.5

Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 12.3  
FTEs for Very High  
Maturity respondents

40

Hours per week spent by 508 PM vs avg. 35  
hours for Very High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Very High	High
Communications	High	High
Content Creation	High	Very High
Human Capital, Culture, & Leadership**	High	Moderate
Technology Lifecycle Activities*	Very High	Moderate
Testing and Validation	High	High
Acquisition and Procurement	Very High	High
Training**	High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% -90%	<50%	100%	90% -99%	50% -90%	100%	100%	50% -90%	90% -99%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	100% fully conform	86% fully conform	FY24	100% fully conform	30% fully conform	20% fully conform	100% fully conform
FY23	100% fully conform	88% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-88

# Food and Drug Administration

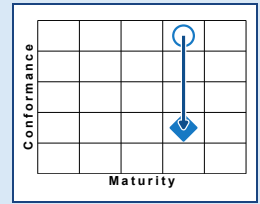
Department of Health and Human Services

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

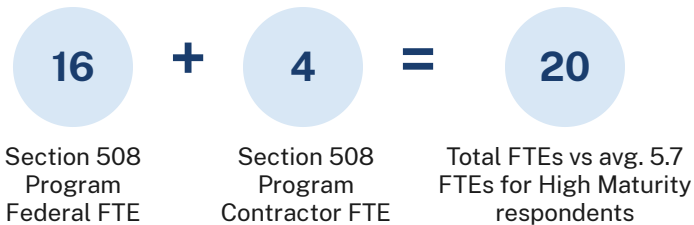
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**30** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	High
Policies, Procedures & Practices*	Very High	High
Communications**	High	High
Content Creation	High	High
Human Capital, Culture, & Leadership	High	Moderate
Technology Lifecycle Activities	Very High	High
Testing and Validation	High	Moderate
Acquisition and Procurement	High	Moderate
Training	High	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% - 99%	50% - 90%	50% - 90%	50% - 90%	50% - 90%	100%	90% - 99%	50% - 90%	100%	50% - 90%

## ICT Testing Outcomes

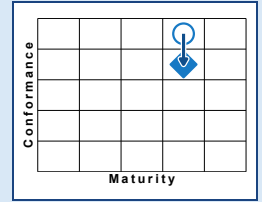
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	70% fully conform	91% fully conform	FY24	0% fully conform	0% fully conform	0% fully conform	0% fully conform
FY23	100% fully conform	97% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	100% fully conform

## Overall Performance

**Maturity: High | Conformance: High**

**Recommendations for High Maturity, High Conformance:**

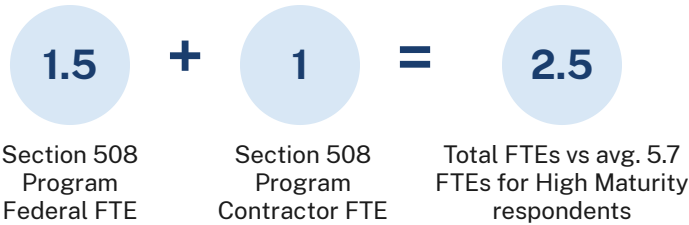
Those in the High-High overall performance category should consider a balanced approach to improving maturity, particularly around prioritizing risk in the technology development lifecycle.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices*	Very High	Very High
Communications	Very High	Moderate
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	High	High
Technology Lifecycle Activities	High	High
Testing and Validation	High	High
Acquisition and Procurement	Very High	High
Training**	Moderate	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% -90%	Unknown	Unknown	Unknown	Unknown	90% -99%	50% -90%	90% -99%	90% -99%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	90% fully conform	100% fully conform	FY24	Not Tested	100% fully conform	100% fully conform	100% fully conform
FY23	58.% fully conform	100% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	100% fully conform





# Indian Health Service

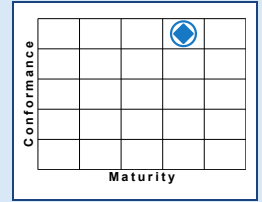
Department of Health and Human Services

## Overall Performance

**Maturity: High | Conformance: Very High**

### Recommendations for High Maturity, Very High Conformance:

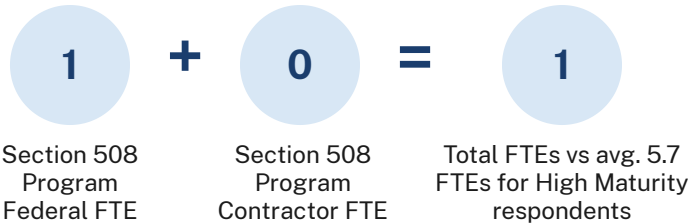
Those in the High-Very High overall performance category should consider a continuing process improvement that includes incremental improvements in the testing efforts and resourcing, while investing more in accessibility communication and Section 508 program efforts.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices*	Very High	Very High
Communications**	Low	High
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	Low	Very Low
Technology Lifecycle Activities	High	Moderate
Testing and Validation	Moderate	Moderate
Acquisition and Procurement	Very High	High
Training	High	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	100%	100%	100%	50% -90%	100%	100%	100%	100%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	100% fully conform	80% fully conform	FY24	100% fully conform	100% fully conform	100% fully conform	Not Tested
FY23	80% fully conform	80% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-91





National Institutes  
of Health

# National Institutes of Health

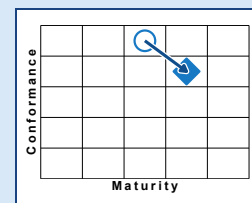
Department of Health and Human Services

## Overall Performance

**Maturity: High | Conformance: High**

**Recommendations for High Maturity, High Conformance:**

Those in the High-High overall performance category should consider a balanced approach to improving maturity, particularly around prioritizing risk in the technology development lifecycle.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.

22

+

40.5

=

62.5

Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 5.7  
FTEs for High Maturity  
respondents

40

Hours per week spent by 508 PM vs avg. 23  
hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices*	Very High	High
Communications	Very High	High
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	High	High
Technology Lifecycle Activities**	Low	Moderate
Testing and Validation	Moderate	Low
Acquisition and Procurement	Low	Moderate
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	50% - 90%	100%	100%	Unknown	100%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	48% fully conform	65% fully conform	FY24	60% fully conform	70% fully conform	90% fully conform	60% fully conform
FY23	75% fully conform	85% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-92

# Substance Abuse and Mental Health Services Administration

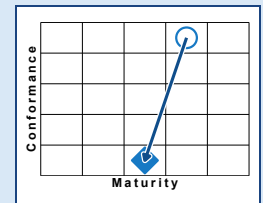
Department of Health and Human Services

## Overall Performance

**Maturity: Moderate | Conformance: Very Low**

### Recommendations for Moderate Maturity, Very Low Conformance:

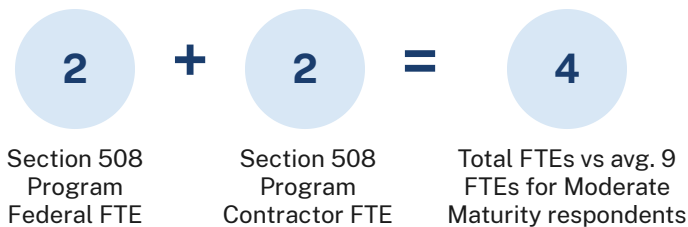
Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Moderate
Policies, Procedures & Practices	Low	Moderate
Communications	High	Moderate
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership**	Very Low	High
Technology Lifecycle Activities**	Very Low	Very High
Testing and Validation	Very High	High
Acquisition and Procurement	Moderate	High
Training	Low	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	80% fully conform	99% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-93

## Department of Homeland Security

- Department of Homeland Security (DHS)
- Countering Weapons of Mass Destruction Office (CWMD)\*
- Customs and Border Protection (CBP)
- Cybersecurity and Infrastructure Security Agency (CISA)
- Federal Emergency Management Agency (FEMA)
- Federal Law Enforcement Training Center (FLETC)
- Immigration and Customs Enforcement (ICE)
- Office of Biometric Identity Management (OBIM)\*
- Office of Inspector General (DHSOIG)
- Science & Technology Directorate (ST)
- Transportation Security Administration (TSA)
- U.S. Citizenship and Immigration Services (USCIS)
- United States Coast Guard (USCG)
- United States Secret Service (USSS)

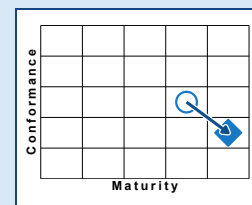
\*Entity only reported data in FY24

## Overall Performance

**Maturity: Very High | Conformance: Low**

### Recommendations for Very High Maturity, Low Conformance:

Those in the Very High-Low overall performance category should invest in testing efforts and resource allocation in order to improve their testing consistency and conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.

17.1

+

6.1

=

23.2

Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 12.3  
FTEs for Very High  
Maturity respondents

**40** Hours per week spent by 508 PM vs avg. 35 hours for Very High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	Very High
Policies, Procedures & Practices	Very High	Very High
Communications	Very High	High
Content Creation*	Very High	High
Human Capital, Culture, & Leadership**	High	High
Technology Lifecycle Activities*	Very High	High
Testing and Validation	High	High
Acquisition and Procurement	High	Moderate
Training	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
<50%	90% - 99%	90% - 99%	90% - 99%	50% - 90%	100%	100%	100%	50% - 90%	50% - 90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	90% fully conform	FY24	Not Tested	40% fully conform	40% fully conform	0% fully conform
FY23	Not Tested	78% fully conform	FY23	Not Tested	Not Tested	100% fully conform	20% fully conform

# Countering Weapons of Mass Destruction Office

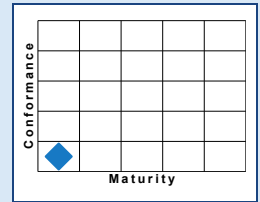
Department of Homeland Security

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

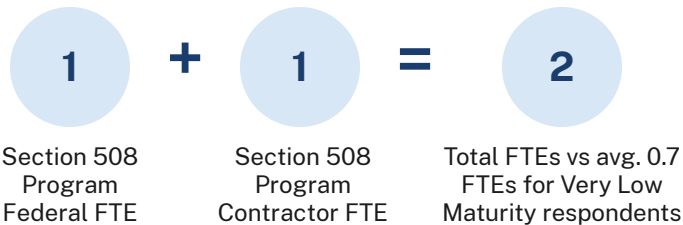
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Never integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**5** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Low	No Data
Policies, Procedures & Practices	Very Low	No Data
Communications**	Very Low	No Data
Content Creation**	Very Low	No Data
Human Capital, Culture, & Leadership**	Very Low	No Data
Technology Lifecycle Activities	Very Low	No Data
Testing and Validation**	Very Low	No Data
Acquisition and Procurement	Very Low	No Data
Training**	Very Low	No Data

\* Highest in FY24 \*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data

# Customs and Border Protection

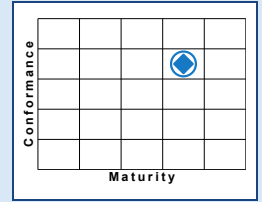
Department of Homeland Security

## Overall Performance

**Maturity: High | Conformance: High**

### Recommendations for High Maturity, High Conformance:

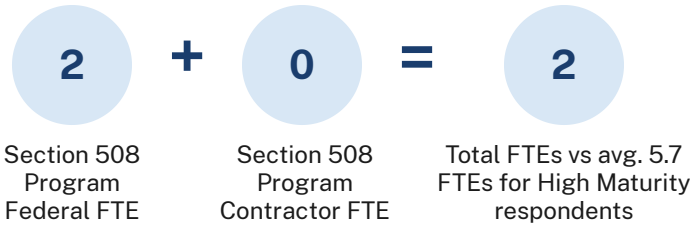
Those in the High-High overall performance category should consider a balanced approach to improving maturity, particularly around prioritizing risk in the technology development lifecycle.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	Very High
Policies, Procedures & Practices	Very High	Very High
Communications	High	High
Content Creation	High	Very High
Human Capital, Culture, & Leadership**	Low	Moderate
Technology Lifecycle Activities	High	High
Testing and Validation	High	High
Acquisition and Procurement	Very High	Very High
Training	Moderate	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	Unknown	Unknown	90% - 99%	90% - 99%	N/A	90% - 99%	90% - 99%	N/A	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	70% fully conform	90% fully conform	FY24	10% fully conform	60% fully conform	70% fully conform	Not Applicable
FY23	70% fully conform	84% fully conform	FY23	0% fully conform	50% fully conform	100% fully conform	0% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-97



# Cybersecurity and Infrastructure Security Agency

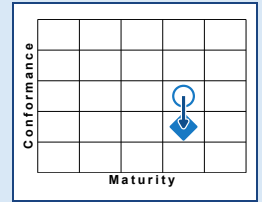
Department of Homeland Security

## Overall Performance

**Maturity: High | Conformance: Low**

**Recommendations for High Maturity, Low Conformance:**

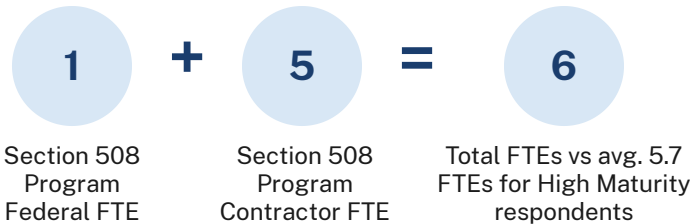
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	High
Policies, Procedures & Practices**	Moderate	High
Communications	High	Moderate
Content Creation	Very High	High
Human Capital, Culture, & Leadership	High	High
Technology Lifecycle Activities	High	Low
Testing and Validation	High	High
Acquisition and Procurement	High	Moderate
Training	High	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
<50%	90% -99%	90% -99%	90% -99%	50% -90%	100%	100%	100%	50% -90%	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	83.2% fully conform	FY24	Not Tested	0% fully conform	0% fully conform	0% fully conform
FY23	Not Tested	85% fully conform	FY23	Not Tested	0% fully conform	70% fully conform	0% fully conform





# Federal Emergency Management Agency

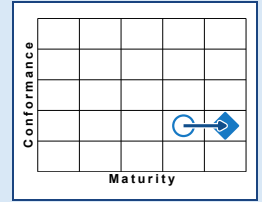
Department of Homeland Security

## Overall Performance

**Maturity: Very High | Conformance: Low**

**Recommendations for Very High Maturity, Low Conformance:**

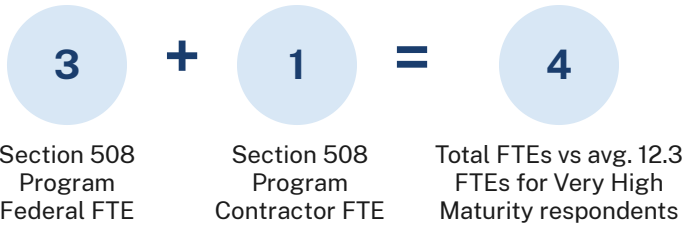
Those in the Very High-Low overall performance category should invest in testing efforts and resource allocation in order to improve their testing consistency and conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 35 hours for Very High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	Very High
Policies, Procedures & Practices	High	High
Communications	Very High	High
Content Creation*	Very High	High
Human Capital, Culture, & Leadership	High	High
Technology Lifecycle Activities	Very High	Very High
Testing and Validation	Very High	High
Acquisition and Procurement**	Moderate	Moderate
Training	High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
<50%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	30% fully conform	70% fully conform	FY24	0% fully conform	0% fully conform	0% fully conform	0% fully conform
FY23	10% fully conform	58% fully conform	FY23	0% fully conform	0% fully conform	0% fully conform	0% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-99



# Federal Law Enforcement Training Center

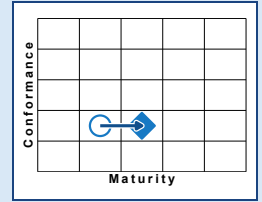
Department of Homeland Security

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 9  
FTEs for Moderate  
Maturity respondents

**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	High	Moderate
Policies, Procedures & Practices	Moderate	High
Communications	Low	Low
Content Creation**	Very Low	Very Low
Human Capital, Culture, & Leadership	Moderate	Very High
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation	Low	Very Low
Acquisition and Procurement	Moderate	Low
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	100%	50% -90%	N/A	N/A	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Applicable	Not Tested
FY23	Not Tested	84% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-100



# Immigration and Customs Enforcement

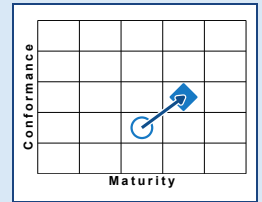
Department of Homeland Security

## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

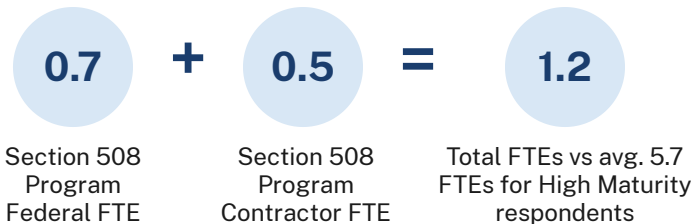
Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**28** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Very High
Policies, Procedures & Practices	Very High	High
Communications*	Very High	Very Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	High	High
Technology Lifecycle Activities	High	High
Testing and Validation**	Low	Moderate
Acquisition and Procurement	High	High
Training	High	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	Unknown	Unknown	Unknown	Unknown	100%	50% -90%	50% -90%	100%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	99% fully conform	FY24	Not Tested	90% fully conform	100% fully conform	100% fully conform
FY23	75% fully conform	70% fully conform	FY23	Not Tested	0% fully conform	Not Tested	40% fully conform

# Office of Biometric Identity Management

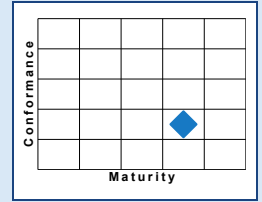
Department of Homeland Security

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

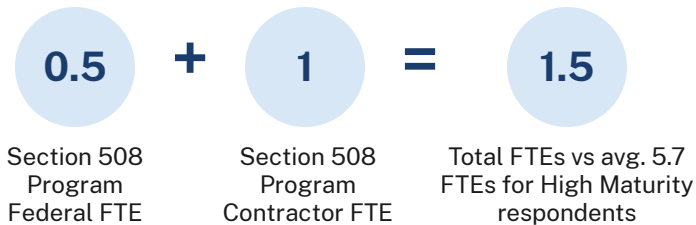
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**8** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	No Data
Policies, Procedures & Practices	Moderate	No Data
Communications	High	No Data
Content Creation	Moderate	No Data
Human Capital, Culture, & Leadership	Very High	No Data
Technology Lifecycle Activities*	Very High	No Data
Testing and Validation	Moderate	No Data
Acquisition and Procurement*	Very High	No Data
Training**	Low	No Data

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	Unknown	Unknown	N/A	Unknown	N/A	N/A	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	100% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data

# Office of Inspector General

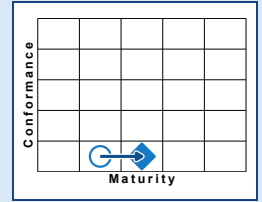
Department of Homeland Security

## Overall Performance

**Maturity: Moderate | Conformance: Very Low**

**Recommendations for Moderate Maturity, Very Low Conformance:**

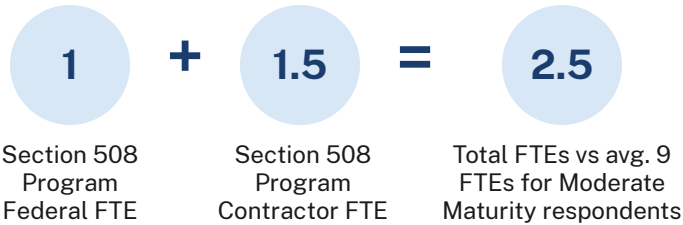
Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**25** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Low	Low
Communications*	Very High	Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities**	Very Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement	High	Moderate
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% -90%	Unknown	Unknown	90% -99%	50% -90%	100%	Unknown	Unknown	50% -90%	Unknown

## ICT Testing Outcomes

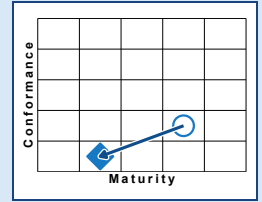
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	0% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	0% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

## Overall Performance

**Maturity: Low | Conformance: Very Low**

**Recommendations for Low Maturity, Very Low Conformance:**

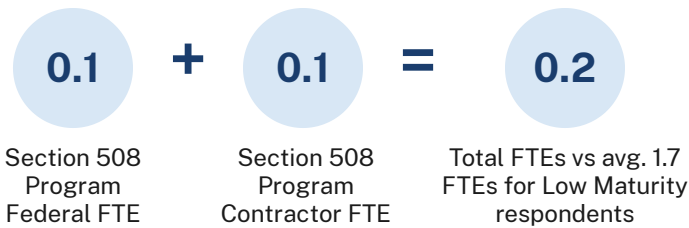
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Moderate
Policies, Procedures & Practices	Moderate	High
Communications**	Very Low	High
Content Creation	Low	High
Human Capital, Culture, & Leadership	Moderate	High
Technology Lifecycle Activities**	Very Low	High
Testing and Validation	Low	Very High
Acquisition and Procurement*	Moderate	Very High
Training	Low	Very High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% - 90%	50% - 90%	50% - 90%	50% - 90%	50% - 90%	50% - 90%	50% - 90%	50% - 90%	50% - 90%	50% - 90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	95% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested



# Transportation Security Administration

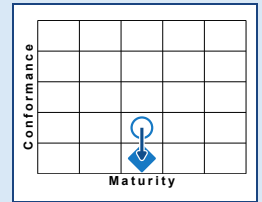
Department of Homeland Security

## Overall Performance

**Maturity: Moderate | Conformance: Very Low**

**Recommendations for Moderate Maturity, Very Low Conformance:**

Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**30** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices*	High	Moderate
Communications	Low	Low
Content Creation**	Low	Moderate
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities	Low	Moderate
Testing and Validation	Moderate	Moderate
Acquisition and Procurement	Moderate	Moderate
Training	Moderate	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	100%	100%	50% -90%	90% -99%	100%	50% -90%	Unknown	50% -90%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	0% fully conform	0% fully conform	30% fully conform	0% fully conform
FY23	55% fully conform	25% fully conform	FY23	0% fully conform	40% fully conform	20% fully conform	0% fully conform





# U.S. Citizenship and Immigration Services

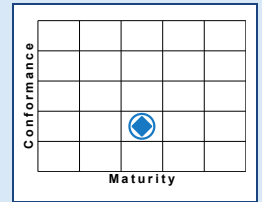
Department of Homeland Security

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 9  
FTEs for Moderate  
Maturity respondents

**20** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	High
Policies, Procedures & Practices**	Very Low	High
Communications	Very Low	High
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities*	High	High
Testing and Validation	Moderate	High
Acquisition and Procurement	High	Moderate
Training	High	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% -90%	Unknown	50% -90%	90% -99%	N/A	100%	50% -90%	50% -90%	Unknown	50% -90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	87% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	33% fully conform	85% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested



# United States Coast Guard

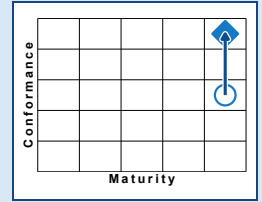
Department of Homeland Security

## Overall Performance

**Maturity: Very High | Conformance: Very High**

### Recommendations for Very High Maturity, Very High Conformance:

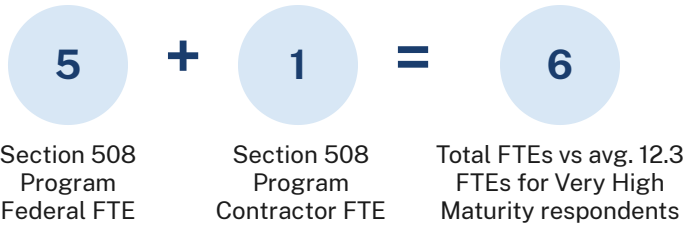
Those in the Very High-Very High overall performance category should continue to make incremental improvements particularly in their testing and remediation efforts due to the variability in some of their conformance results.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 35 hours for Very High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	Very High
Policies, Procedures & Practices*	Very High	Very High
Communications*	Very High	Very High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	Very High	Very High
Technology Lifecycle Activities*	Very High	Very High
Testing and Validation**	Very High	Very High
Acquisition and Procurement*	Very High	Very High
Training	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90%-99%	90%-99%	90%-99%	100%	90%-99%	100%	90%-99%	100%	100%	90%-99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	90% fully conform	82% fully conform	FY24	90% fully conform	20% fully conform	100% fully conform	100% fully conform
FY23	80% fully conform	72% fully conform	FY23	70% fully conform	0% fully conform	67% fully conform	0% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-107

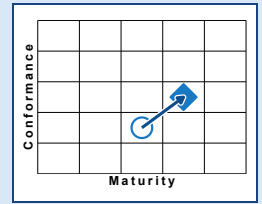


## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

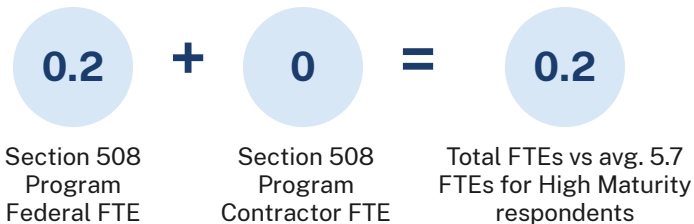
Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	High	High
Communications*	Very High	Moderate
Content Creation**	Low	Moderate
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities	High	Moderate
Testing and Validation	High	Low
Acquisition and Procurement	High	High
Training**	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	100%	100%	N/A	100%	100%	N/A	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Applicable	Not Applicable
FY23	Not Tested	98% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

# Department of Housing and Urban Development

---

- Department of Housing and Urban Development (HUD)

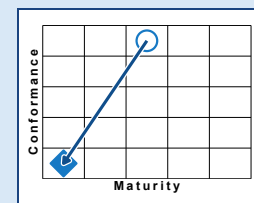
# Department of Housing and Urban Development

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

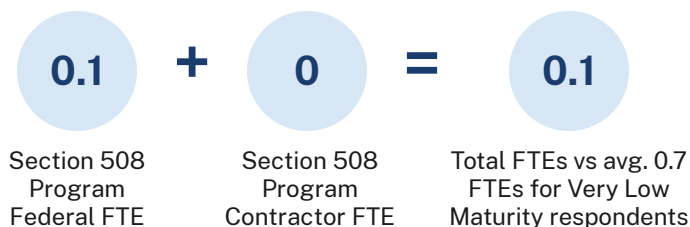
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is never integrated throughout technology development lifecycle activities.



**5** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Moderate
Policies, Procedures & Practices*	Moderate	Moderate
Communications**	Very Low	Very Low
Content Creation	Very Low	Moderate
Human Capital, Culture, & Leadership	Low	Moderate
Technology Lifecycle Activities	Very Low	Moderate
Testing and Validation	Very Low	Moderate
Acquisition and Procurement	Very Low	Moderate
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	100%	90% -99%	<50%	Unknown	Unknown	Unknown	<50%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	100% fully conform	10% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	100% fully conform	100% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	100% fully conform

## Department of Justice

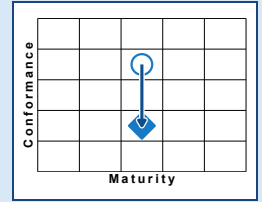
- Department of Justice (DOJ)
- Antitrust Division (AD)
- Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF)
- Civil Division (CIVD)
- Civil Rights Division (CIVR)
- Criminal Division (CD)
- Drug Enforcement Administration (DEA)
- Environment & Natural Resources Division (ENRD)
- Executive Office for Immigration Review (EOIR)
- Executive Office for United States Attorneys (EOUSA)
- Executive Office for United States Trustees (EOUST)
- Federal Bureau of Investigation (FBI)
- Federal Bureau of Prisons (BOP)
- Interpol (INT)
- National Security Division (NSD)
- Office of Justice Programs (OJP)
- Office of the Inspector General (DOJOIG)
- Tax Division (TD)
- United States Marshals Service (USMS)

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

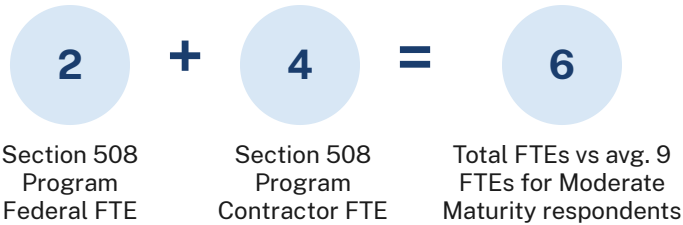
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**6** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices*	Very High	Low
Communications	High	Moderate
Content Creation	High	Low
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities**	Very Low	Low
Testing and Validation	High	Moderate
Acquisition and Procurement	Moderate	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	100%	100%	100%	100%	50%-90%	90%-99%	100%	50%-90%	90%-99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	0% fully conform	FY24	0% fully conform	0% fully conform	20% fully conform	100% fully conform
FY23	92% fully conform	89% fully conform	FY23	20% fully conform	10% fully conform	80% fully conform	100% fully conform



# Antitrust Division

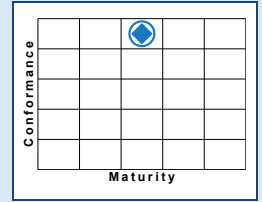
Department of Justice

## Overall Performance

**Maturity: Moderate | Conformance: Very High**

### Recommendations for Moderate Maturity, Very High Conformance:

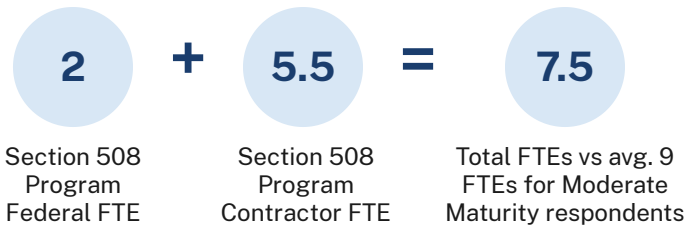
Given such high and consistent conformance, those in the Moderate-Very High overall performance category should allocate resources into building lasting efforts related to ICT accessibility across the enterprise, specifically by maturing their Section 508 program and entity-wide accessibility efforts.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**25** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Moderate
Policies, Procedures & Practices	Low	Moderate
Communications	High	High
Content Creation*	Very High	High
Human Capital, Culture, & Leadership**	Very Low	Low
Technology Lifecycle Activities	Moderate	Low
Testing and Validation	Moderate	High
Acquisition and Procurement	Low	Moderate
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	90% -99%	90% -99%	100%	100%	50% -90%	Unknown	90% -99%	50% -90%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	94% fully conform	FY24	100% fully conform	100% fully conform	100% fully conform	100% fully conform
FY23	100% fully conform	75% fully conform	FY23	0% fully conform	100% fully conform	100% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-113



# Bureau of Alcohol, Tobacco, Firearms, and Explosives

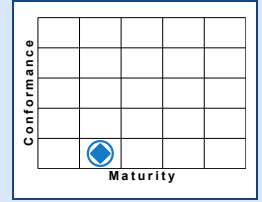
Department of Justice

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

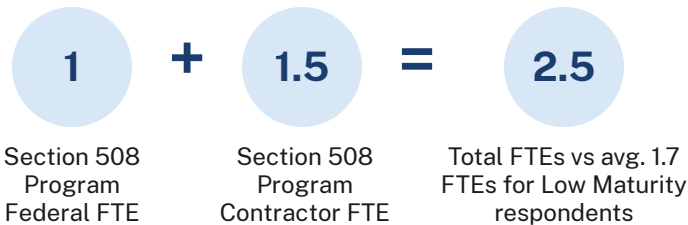
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



2

Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices	Very Low	Very Low
Communications	Low	Very Low
Content Creation	Low	Low
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Low	Low
Testing and Validation*	Moderate	Low
Acquisition and Procurement	Low	Moderate
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	Unknown	Unknown	N/A	Unknown	90% - 99%	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	1% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

# Civil Division

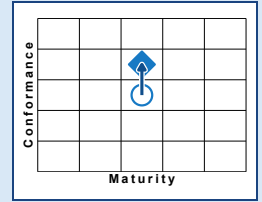
Department of Justice

## Overall Performance

**Maturity: Moderate | Conformance: High**

### Recommendations for Moderate Maturity, High Conformance:

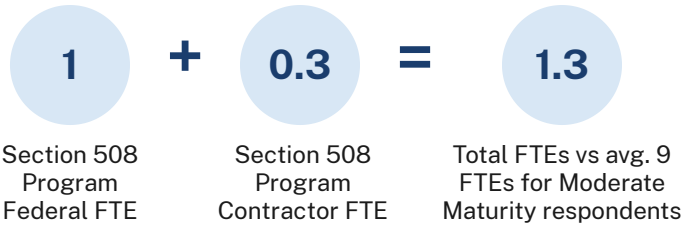
Although overall performing moderately well in the Acquisition and Procurement maturity dimension, those in the Moderate-High overall performance category should continue to develop capabilities to verify the accessibility of contract deliverables as well as improving their Section 508 training planning and capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**0.5** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices*	High	High
Communications	High	Very Low
Content Creation	Moderate	Very Low
Human Capital, Culture, & Leadership	Low	Very Low
Technology Lifecycle Activities	Low	Moderate
Testing and Validation	Moderate	Moderate
Acquisition and Procurement	Moderate	Moderate
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	N/A	N/A	90% -99%	100%	50% -90%	Unknown	90% -99%	50% -90%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	95% fully conform	FY24	Not Tested	100% fully conform	100% fully conform	100% fully conform
FY23	Not Tested	91% fully conform	FY23	Not Tested	90% fully conform	50% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-115

# Civil Rights Division

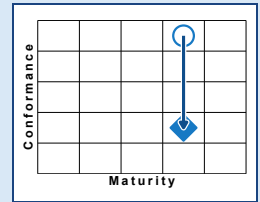
Department of Justice

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

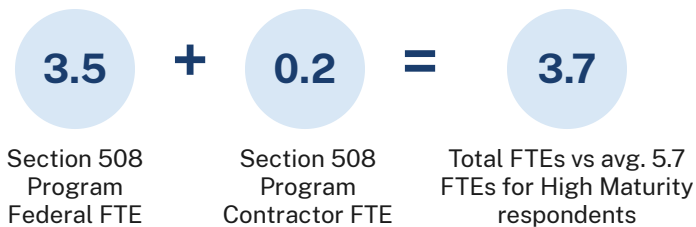
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	High	Very High
Communications	Very High	Moderate
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership**	Very Low	Moderate
Technology Lifecycle Activities	Very High	Very High
Testing and Validation*	Very High	Moderate
Acquisition and Procurement*	Very High	Very High
Training	Moderate	Low

\* Highest in FY24 \*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	100%	100%	100%	100%	50% -90%	100%	100%	50% -90%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	100% fully conform	FY24	0% fully conform	0% fully conform	0% fully conform	0% fully conform
FY23	100% fully conform	100% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	100% fully conform

# Criminal Division

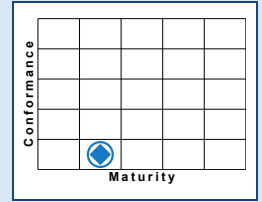
Department of Justice

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

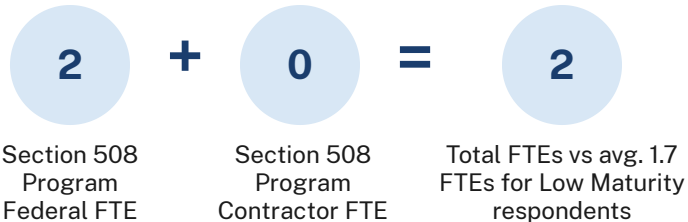
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**1** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices**	Very Low	Very Low
Communications	Low	Very Low
Content Creation	Very Low	Very Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Very Low	Low
Testing and Validation**	Very Low	Very Low
Acquisition and Procurement*	Moderate	Moderate
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% -90%	50% -90%	50% -90%	50% -90%	50% -90%	50% -90%	50% -90%	50% -90%	50% -90%	50% -90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-117

# Drug Enforcement Administration

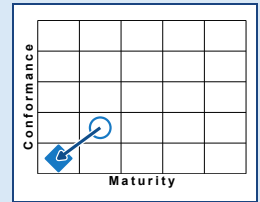
Department of Justice

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

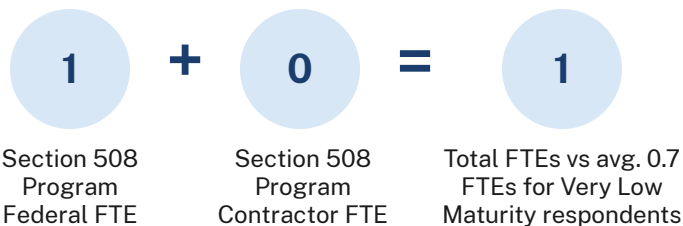
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Does not know how Section 508 reviews are integrated into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**0.5** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Very Low	Low
Policies, Procedures & Practices	Very Low	Moderate
Communications	Very Low	Very Low
Content Creation	Very Low	Moderate
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities*	Very Low	Moderate
Testing and Validation	Very Low	Moderate
Acquisition and Procurement	Very Low	High
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Not Tested	FY24	0% fully conform	Not Tested	0% fully conform	0% fully conform
FY23	100% fully conform	100% fully conform	FY23	Not Tested	Not Tested	0% fully conform	0% fully conform





# Environment & Natural Resources Division

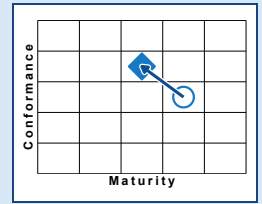
Department of Justice

## Overall Performance

**Maturity: Moderate | Conformance: High**

### Recommendations for Moderate Maturity, High Conformance:

Although overall performing moderately well in the Acquisition and Procurement maturity dimension, those in the Moderate-High overall performance category should continue to develop capabilities to verify the accessibility of contract deliverables as well as improving their Section 508 training planning and capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 9  
FTEs for Moderate  
Maturity respondents

4

Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	High	High
Communications**	Low	High
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership*	High	High
Technology Lifecycle Activities	High	High
Testing and Validation	High	Very High
Acquisition and Procurement	High	High
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	100%	100%	100%	50% -90%	100%	100%	50% -90%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	92% fully conform	100% fully conform	FY24	0% fully conform	100% fully conform	100% fully conform	Not Tested
FY23	92% fully conform	100% fully conform	FY23	0% fully conform	0% fully conform	0% fully conform	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data.

FY24 | C-119



# Executive Office for Immigration Review

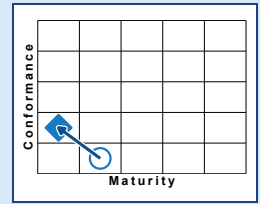
Department of Justice

## Overall Performance

**Maturity: Very Low | Conformance: Low**

### Recommendations for Very Low Maturity, Low Conformance:

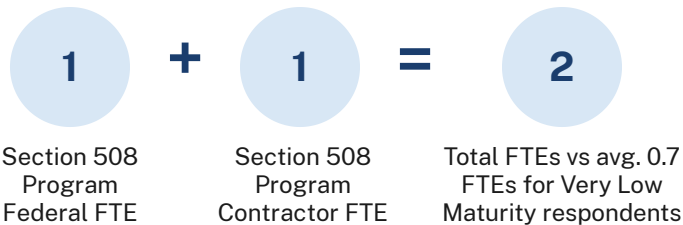
Those in the Very Low-Low overall performance category have several areas where they may invest to improve accessibility. However, as no reporting entity in this category had an established Section 508 program, fully establishing a Section 508 program would likely be a significant first step



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



6

Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Very Low
Policies, Procedures & Practices*	Moderate	Low
Communications	Very Low	Low
Content Creation	Low	Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Very Low	Moderate
Testing and Validation	Very Low	Low
Acquisition and Procurement	Low	Very Low
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	50% - 90%	Unknown	90% - 99%	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	80% fully conform	Unknown	FY24	Not Tested	100% fully conform	100% fully conform	0% fully conform
FY23	Not Tested	4% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

# Executive Office for United States Attorneys

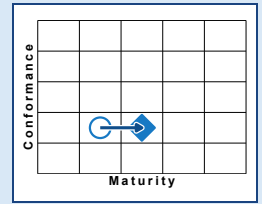
Department of Justice

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.

102.8

+

30

=

132.8

Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 9  
FTEs for Moderate  
Maturity respondents

1

Hours per week spent by 508 PM vs avg. 20.5  
hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Low	High
Policies, Procedures & Practices	Moderate	Moderate
Communications*	Very High	Low
Content Creation	Moderate	Low
Human Capital, Culture, & Leadership	High	Very Low
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation	Moderate	Low
Acquisition and Procurement	Moderate	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	100%	100%	50% -90%	Unknown	90% -99%	50% -90%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	73% fully conform	FY24	Not Tested	100% fully conform	Not Tested	Not Tested
FY23	14% fully conform	0% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-121

# Executive Office for United States Trustees

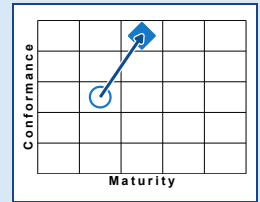
Department of Justice

## Overall Performance

**Maturity: Moderate | Conformance: Very High**

**Recommendations for Moderate Maturity, Very High Conformance:**

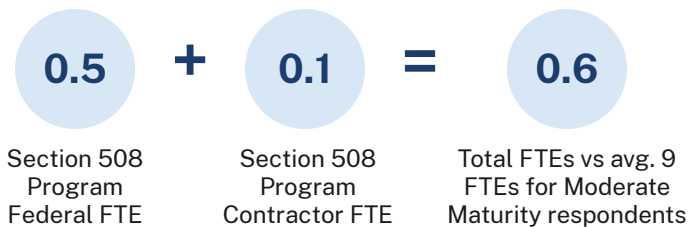
Given such high and consistent conformance, those in the Moderate-Very High overall performance category should allocate resources into building lasting efforts related to ICT accessibility across the enterprise, specifically by maturing their Section 508 program and entity-wide accessibility efforts.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**4** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Low	Low
Communications	Moderate	Low
Content Creation*	Very High	Moderate
Human Capital, Culture, & Leadership	Low	Very Low
Technology Lifecycle Activities**	Low	Low
Testing and Validation	Moderate	Moderate
Acquisition and Procurement**	Low	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	100%	100%	100%	100%	50% -90%	100%	N/A	50% -90%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	100% fully conform	80% fully conform	FY24	100% fully conform	80% fully conform	100% fully conform	100% fully conform
FY23	100% fully conform	0% fully conform	FY23	100% fully conform	0% fully conform	100% fully conform	0% fully conform



# Federal Bureau of Investigation

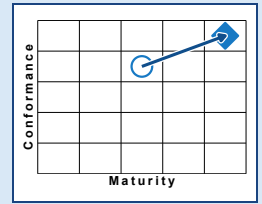
Department of Justice

## Overall Performance

**Maturity: Very High | Conformance: Very High**

### Recommendations for Very High Maturity, Very High Conformance:

Those in the Very High-Very High overall performance category should continue to make incremental improvements particularly in their testing and remediation efforts due to the variability in some of their conformance results.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 35 hours for Very High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	Moderate
Policies, Procedures & Practices	Very High	Very High
Communications	Very High	Low
Content Creation*	Very High	Moderate
Human Capital, Culture, & Leadership	Very High	Moderate
Technology Lifecycle Activities**	High	Moderate
Testing and Validation	Very High	High
Acquisition and Procurement	Very High	High
Training	High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	90% -99%	90% -99%	90% -99%	100%	50% -90%	100%	100%	50% -90%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	73% fully conform	100% fully conform	FY24	90% fully conform	100% fully conform	100% fully conform	100% fully conform
FY23	Not Tested	100% fully conform	FY23	0% fully conform	100% fully conform	100% fully conform	100% fully conform

# Federal Bureau of Prisons

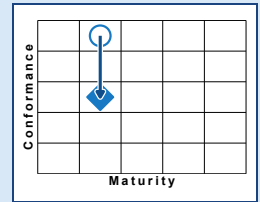
Department of Justice

## Overall Performance

**Maturity: Low | Conformance: Moderate**

### Recommendations for Low Maturity, Moderate Conformance:

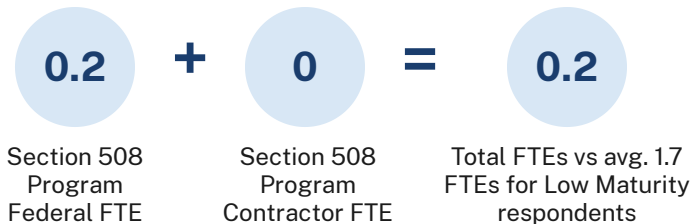
Those in the Low-Moderate overall performance category should continue to invest in establishing processes for creating accessible communications as well as addressing accessibility in acquisition within the entity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**3** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Very Low
Policies, Procedures & Practices	Very Low	Very Low
Communications**	Very Low	Very Low
Content Creation*	Very High	Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Low	Moderate
Testing and Validation	Very High	Very High
Acquisition and Procurement	Very Low	Moderate
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

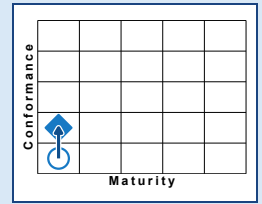
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	20% fully conform	100% fully conform	FY24	Not Tested	100% fully conform	Not Tested	100% fully conform
FY23	90% fully conform	100% fully conform	FY23	100% fully conform	100% fully conform	Not Tested	100% fully conform

## Overall Performance

**Maturity: Very Low | Conformance: Low**

### Recommendations for Very Low Maturity, Low Conformance:

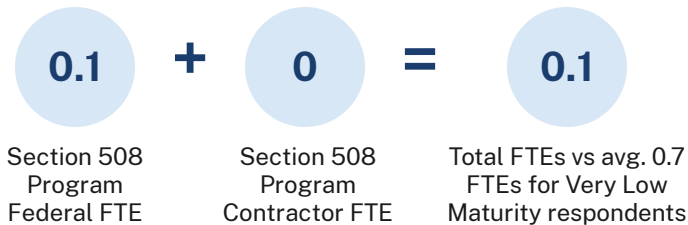
Those in the Very Low-Low overall performance category have several areas where they may invest to improve accessibility. However, as no reporting entity in this category had an established Section 508 program, fully establishing a Section 508 program would likely be a significant first step



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**1** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Very Low
Policies, Procedures & Practices**	Very Low	Very Low
Communications**	Very Low	Very Low
Content Creation	Low	Very Low
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Very Low	Low
Testing and Validation	Low	Very Low
Acquisition and Procurement*	Low	Low
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	100%	Unknown	Unknown	Unknown	N/A	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Not Tested	FY24	Not Tested	Not Applicable	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested





# National Security Division

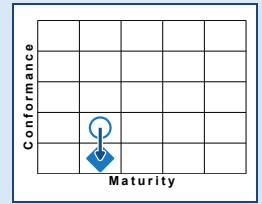
Department of Justice

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

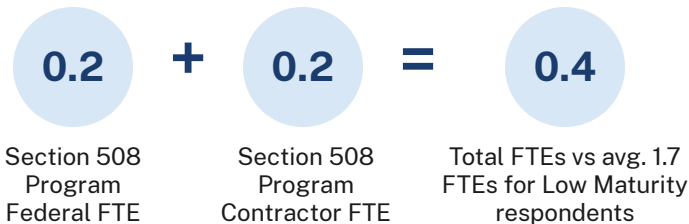
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**1** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Low	Low
Policies, Procedures & Practices**	Very Low	Low
Communications	Low	Low
Content Creation	Low	Low
Human Capital, Culture, & Leadership	Low	Very Low
Technology Lifecycle Activities	Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Low
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	90% -99%	90% -99%	90% -99%	90% -99%	100%	Unknown	Unknown	N/A	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Not Tested	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	0% fully conform	10% fully conform	Not Applicable



# Office of Justice Programs

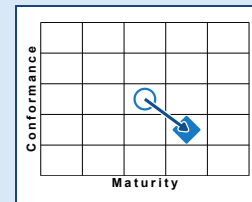
Department of Justice

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 5.7  
FTEs for High Maturity  
respondents

2

Hours per week spent by 508 PM vs avg. 23  
hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Moderate
Policies, Procedures & Practices	Very High	High
Communications	Moderate	Moderate
Content Creation*	Very High	Moderate
Human Capital, Culture, & Leadership	Moderate	Very Low
Technology Lifecycle Activities*	Very High	High
Testing and Validation	High	High
Acquisition and Procurement	High	High
Training**	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	90% - 99%	90% - 99%	90% - 99%	100%	90% - 99%	90% - 99%	90% - 99%	50% - 90%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	90% fully conform	FY24	0% fully conform	0% fully conform	Not Tested	Not Tested
FY23	0% fully conform	98% fully conform	FY23	Not Tested	40% fully conform	Not Tested	Not Tested



# Office of the Inspector General

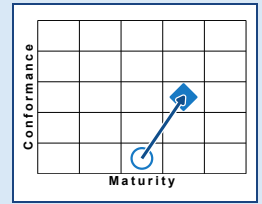
Department of Justice

## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

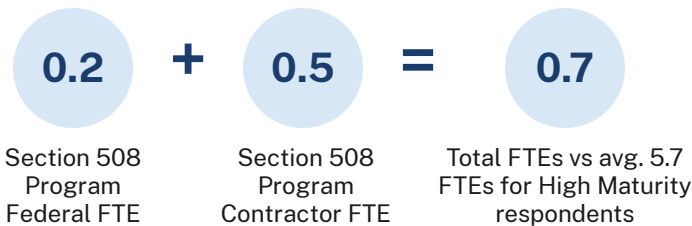
Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**20** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Low
Policies, Procedures & Practices	Very High	Low
Communications	High	Low
Content Creation*	Very High	Low
Human Capital, Culture, & Leadership	Moderate	Low
Technology Lifecycle Activities	Very High	Very High
Testing and Validation	Moderate	Low
Acquisition and Procurement	Very High	Very High
Training**	Low	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	50%-90%	50%-90%	50%-90%	100%	50%-90%	50%-90%	50%-90%	N/A	90%-99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Not Tested	FY24	Not Tested	100% fully conform	100% fully conform	100% fully conform
FY23	0% fully conform	0% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-128



# Tax Division

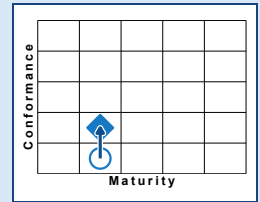
Department of Justice

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

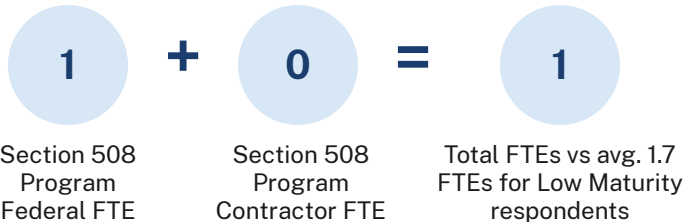
Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**10** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices*	High	Very Low
Communications	Very Low	Very Low
Content Creation	Low	Very Low
Human Capital, Culture, & Leadership	Very Low	Low
Technology Lifecycle Activities	Low	Moderate
Testing and Validation*	High	Low
Acquisition and Procurement**	Very Low	Moderate
Training	Very Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	100%	100%	100%	100%	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	Not Tested	Not Tested	FY23	100% fully conform	Not Tested	Not Tested	Not Tested

# United States Marshals Service

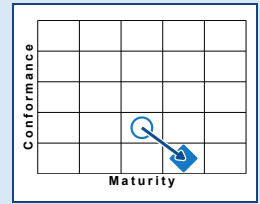
Department of Justice

## Overall Performance

**Maturity: High | Conformance: Very Low**

### Recommendations for High Maturity, Very Low Conformance:

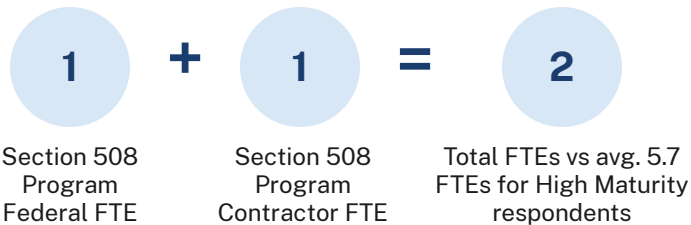
Given relatively high maturity outcomes and a preponderance of responses stating they do not have resources to test for conformance, those in the High-Very Low overall performance category should consider dedicating significant resources to developing testing processes and capabilities and focusing on testing and remediation to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**5** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices	Moderate	High
Communications	Very High	Moderate
Content Creation*	Very High	Low
Human Capital, Culture, & Leadership	High	Low
Technology Lifecycle Activities*	Very High	High
Testing and Validation	Very High	Moderate
Acquisition and Procurement*	Very High	Moderate
Training**	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	Unknown	Unknown	100%	100%	100%	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	0% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	99% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

## Department of Labor

---

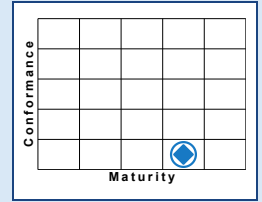
- Department of Labor (DOL)
- Bureau of International Labor Affairs (BILA)
- Bureau of Labor Statistics (BLS)
- Employee Benefits Security Administration (EBSA)
- Employment and Training Administration (ETA)
- Mine Safety and Health Administration (MSHA)
- Occupational Safety and Health Administration (OSHA)
- Office of Disability Employment Policy (ODEP)
- Office of Federal Contract Compliance Programs (OFCCP)
- Office of Labor Management Standards (OLMS)
- Office of Workers' Compensation Programs (OWCP)
- Veterans' Employment and Training Service (VETS)
- Wage and Hour Division (WHD)
- Women's Bureau (WB)

## Overall Performance

**Maturity: High | Conformance: Very Low**

### Recommendations for High Maturity, Very Low Conformance:

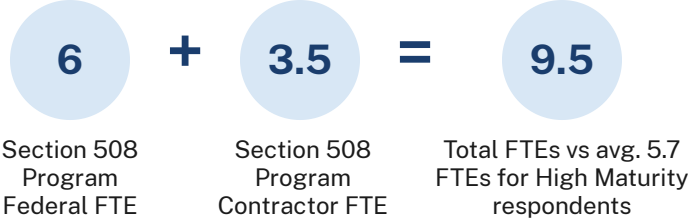
Given relatively high maturity outcomes and a preponderance of responses stating they do not have resources to test for conformance, those in the High-Very Low overall performance category should consider dedicating significant resources to developing testing processes and capabilities and focusing on testing and remediation to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	Very High
Communications**	Moderate	High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	High	High
Technology Lifecycle Activities	High	High
Testing and Validation	High	Moderate
Acquisition and Procurement	High	Moderate
Training*	Very High	Very High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	43% fully conform	7% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

# Bureau of International Labor Affairs

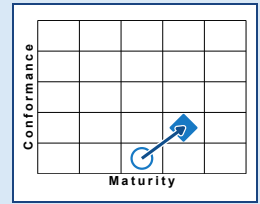
Department of Labor

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

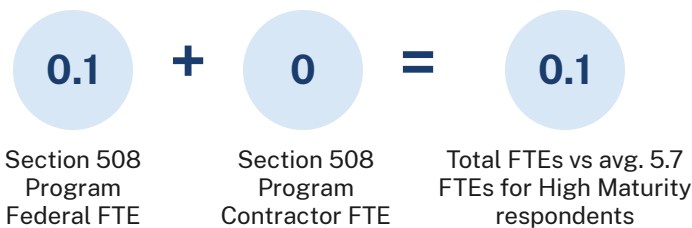
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	High
Communications	Moderate	Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	High	Low
Technology Lifecycle Activities	Moderate	Very Low
Testing and Validation**	Moderate	Very Low
Acquisition and Procurement	High	Moderate
Training*	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	Not Tested	12% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-133





# Bureau of Labor Statistics

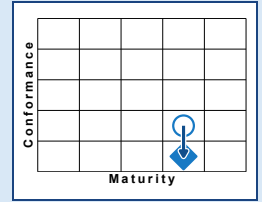
Department of Labor

## Overall Performance

**Maturity: High | Conformance: Very Low**

### Recommendations for High Maturity, Very Low Conformance:

Given relatively high maturity outcomes and a preponderance of responses stating they do not have resources to test for conformance, those in the High-Very Low overall performance category should consider dedicating significant resources to developing testing processes and capabilities and focusing on testing and remediation to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.

14

+

10.5

=

24.5

Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 5.7  
FTEs for High Maturity  
respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	High	High
Communications*	Very High	High
Content Creation	Very High	High
Human Capital, Culture, & Leadership	Very High	Moderate
Technology Lifecycle Activities**	Moderate	Moderate
Testing and Validation	High	Moderate
Acquisition and Procurement	High	Moderate
Training*	Very High	Very High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	76% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

# Employee Benefits Security Administration

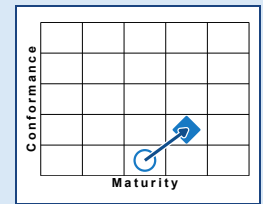
Department of Labor

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

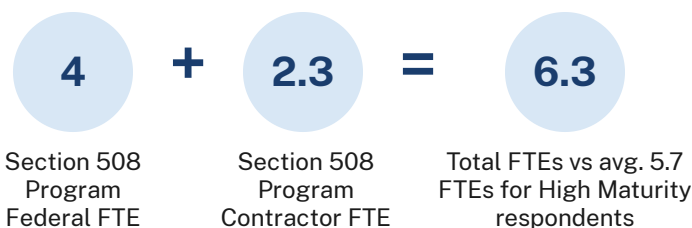
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	High
Communications**	Moderate	High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	High	Moderate
Technology Lifecycle Activities	High	High
Testing and Validation	Moderate	Low
Acquisition and Procurement	High	Moderate
Training*	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	16% fully conform	17% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-135

# Employment and Training Administration

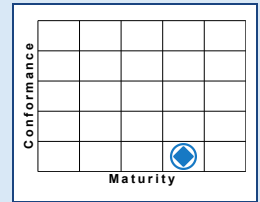
Department of Labor

## Overall Performance

**Maturity: High | Conformance: Very Low**

### Recommendations for High Maturity, Very Low Conformance:

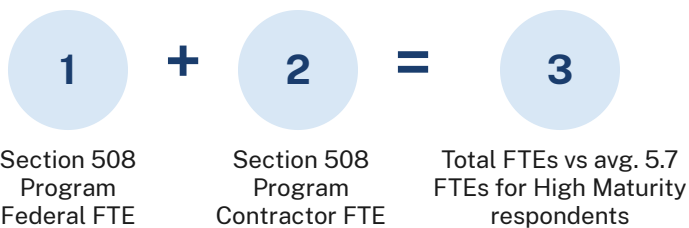
Given relatively high maturity outcomes and a preponderance of responses stating they do not have resources to test for conformance, those in the High-Very Low overall performance category should consider dedicating significant resources to developing testing processes and capabilities and focusing on testing and remediation to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	High
Communications	Moderate	High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	High	High
Technology Lifecycle Activities	High	Moderate
Testing and Validation**	Moderate	Moderate
Acquisition and Procurement	High	Moderate
Training*	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	12% fully conform	% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

# Mine Safety and Health Administration

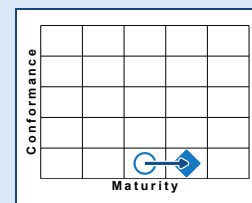
Department of Labor

## Overall Performance

**Maturity: High | Conformance: Very Low**

### Recommendations for High Maturity, Very Low Conformance:

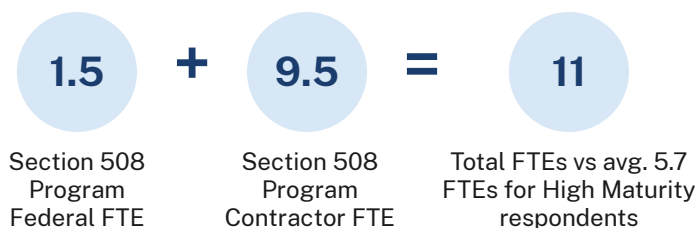
Given relatively high maturity outcomes and a preponderance of responses stating they do not have resources to test for conformance, those in the High-Very Low overall performance category should consider dedicating significant resources to developing testing processes and capabilities and focusing on testing and remediation to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	High
Communications	Moderate	Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	High	Moderate
Technology Lifecycle Activities	High	Low
Testing and Validation**	Moderate	Very Low
Acquisition and Procurement	High	Moderate
Training*	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	13% fully conform	11% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested



# Occupational Safety and Health Administration

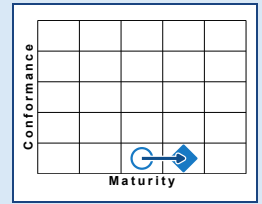
Department of Labor

## Overall Performance

**Maturity: High | Conformance: Very Low**

### Recommendations for High Maturity, Very Low Conformance:

Given relatively high maturity outcomes and a preponderance of responses stating they do not have resources to test for conformance, those in the High-Very Low overall performance category should consider dedicating significant resources to developing testing processes and capabilities and focusing on testing and remediation to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.

4.3

+

1.3

=

5.6

Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 5.7  
FTEs for High Maturity  
respondents

**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	Very High
Communications	Moderate	High
Content Creation	High	Very High
Human Capital, Culture, & Leadership	High	Moderate
Technology Lifecycle Activities	High	Moderate
Testing and Validation**	Moderate	Very Low
Acquisition and Procurement	High	Moderate
Training*	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

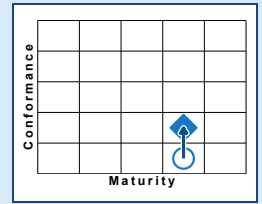
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	11% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

## Overall Performance

**Maturity: High | Conformance: Low**

**Recommendations for High Maturity, Low Conformance:**

Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 5.7  
FTEs for High Maturity  
respondents

**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	Very High
Communications**	Moderate	Very High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	Very High	Very High
Technology Lifecycle Activities	High	High
Testing and Validation	High	Low
Acquisition and Procurement	High	Very High
Training	Very High	Very High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	Not Tested	22% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested





# Office of Federal Contract Compliance Programs

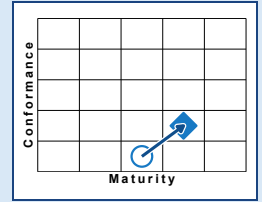
Department of Labor

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

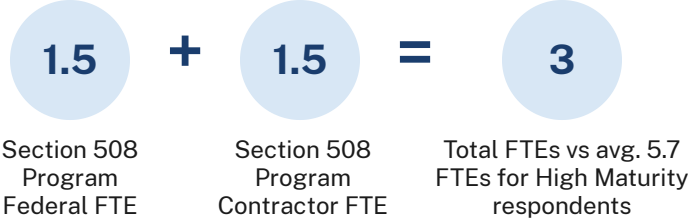
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	High
Communications	Moderate	Very High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	High	Moderate
Technology Lifecycle Activities	High	Moderate
Testing and Validation**	Moderate	Very Low
Acquisition and Procurement	High	Moderate
Training	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	15% fully conform	30% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-140



# Office of Labor Management Standards

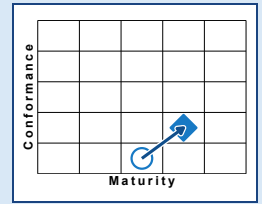
Department of Labor

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

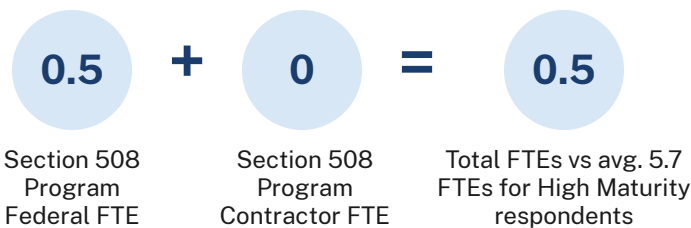
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	High
Communications**	Moderate	Moderate
Content Creation	High	High
Human Capital, Culture, & Leadership	High	Low
Technology Lifecycle Activities**	Moderate	Low
Testing and Validation	Moderate	Low
Acquisition and Procurement	High	Moderate
Training*	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	37% fully conform	25% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-141

# Office of Workers' Compensation Programs

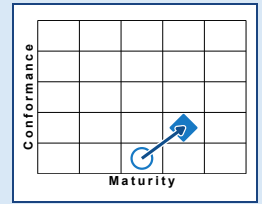
Department of Labor

## Overall Performance

**Maturity: High | Conformance: Low**

**Recommendations for High Maturity, Low Conformance:**

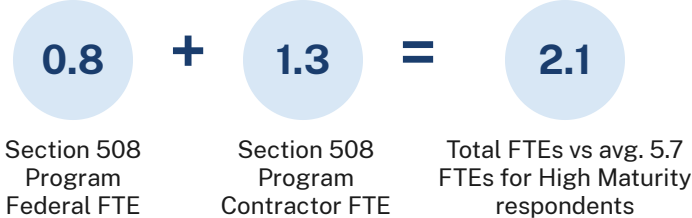
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	High
Communications	Moderate	Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	High	Moderate
Technology Lifecycle Activities	High	Low
Testing and Validation**	Moderate	Very Low
Acquisition and Procurement	High	Moderate
Training*	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	14% fully conform	16% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested



# Veterans' Employment and Training Service

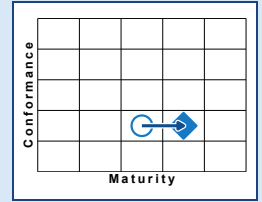
Department of Labor

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

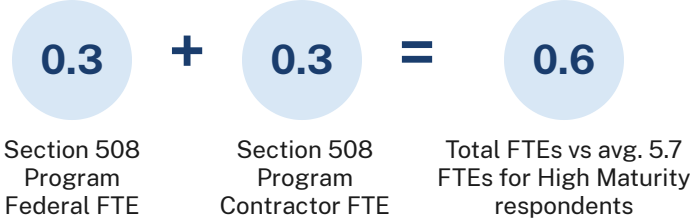
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	High
Communications	Moderate	Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	High	Low
Technology Lifecycle Activities	Moderate	Low
Testing and Validation**	Moderate	Very Low
Acquisition and Procurement	High	Moderate
Training*	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

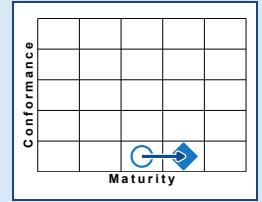
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	86% fully conform	13% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Applicable

## Overall Performance

**Maturity: High | Conformance: Very Low**

**Recommendations for High Maturity, Very Low Conformance:**

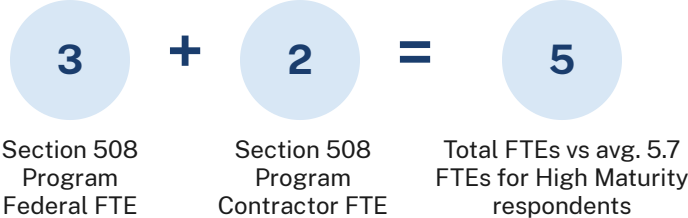
Given relatively high maturity outcomes and a preponderance of responses stating they do not have resources to test for conformance, those in the High-Very Low overall performance category should consider dedicating significant resources to developing testing processes and capabilities and focusing on testing and remediation to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	High
Communications**	Moderate	Low
Content Creation*	Very High	Moderate
Human Capital, Culture, & Leadership	High	Moderate
Technology Lifecycle Activities	High	Low
Testing and Validation	Moderate	Very Low
Acquisition and Procurement	High	Moderate
Training*	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

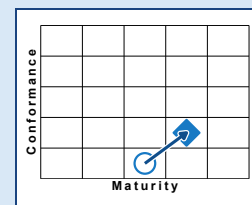
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	21% fully conform	17% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

## Overall Performance

**Maturity: High | Conformance: Low**

**Recommendations for High Maturity, Low Conformance:**

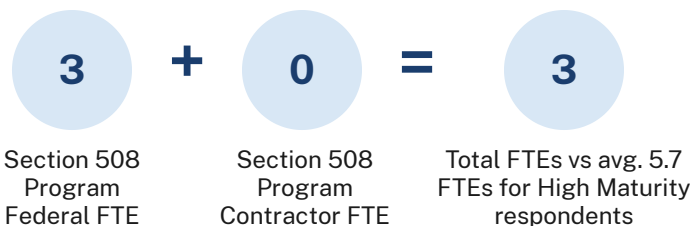
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	High
Communications**	Moderate	Low
Content Creation*	Very High	Moderate
Human Capital, Culture, & Leadership	High	Low
Technology Lifecycle Activities**	Moderate	Very Low
Testing and Validation	High	Very Low
Acquisition and Procurement	High	Moderate
Training*	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	Not Tested	31% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

# Department of State

---

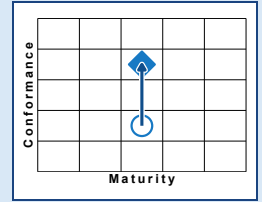
- Department of State (STATE)

## Overall Performance

**Maturity: Moderate | Conformance: High**

### Recommendations for Moderate Maturity, High Conformance:

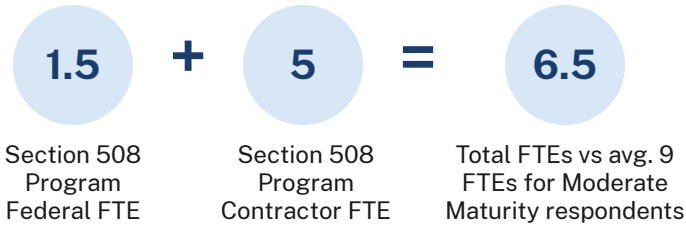
Although overall performing moderately well in the Acquisition and Procurement maturity dimension, those in the Moderate-High overall performance category should continue to develop capabilities to verify the accessibility of contract deliverables as well as improving their Section 508 training planning and capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**30** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	Moderate	Moderate
Communications*	Very High	High
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	High	Moderate
Technology Lifecycle Activities	Moderate	Low
Testing and Validation	Moderate	Low
Acquisition and Procurement**	Low	Low
Training	Moderate	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% - 99%	90% - 99%	50% - 90%	90% - 99%	50% - 90%	100%	50% - 90%	<50%	90% - 99%	50% - 90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	71% fully conform	70% fully conform	FY24	30% fully conform	30% fully conform	60% fully conform	100% fully conform
FY23	75% fully conform	52% fully conform	FY23	10% fully conform	0% fully conform	0% fully conform	0% fully conform



## Department of the Interior

---

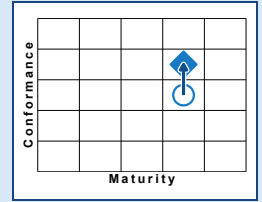
- Department of the Interior (DOI)
- Bureau of Indian Affairs (BIA)
- Bureau of Indian Education (BIE)
- Bureau of Land Management (BLM)
- Bureau of Ocean Energy Management (BOEM)
- Bureau of Reclamation (BOR)
- Bureau of Safety and Environmental Enforcement (BSEE)
- Bureau of Trust Funds Administration (BTFA)
- National Indian Gaming Commission (NIGC)
- National Park Service (NPS)
- Office of Natural Resources Revenue (ONRR)
- Office of Surface Mining Reclamation and Enforcement (OSMRE)
- United States Fish and Wildlife Service (FWS)
- United States Geological Survey (USGS)

## Overall Performance

**Maturity: High | Conformance: High**

### Recommendations for High Maturity, High Conformance:

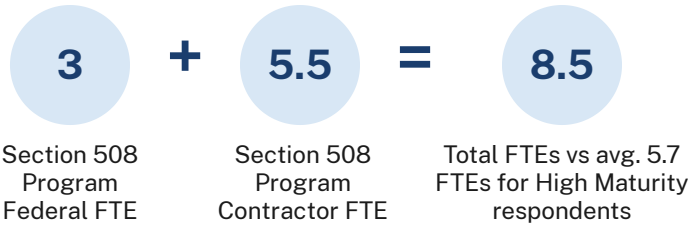
Those in the High-High overall performance category should consider a balanced approach to improving maturity, particularly around prioritizing risk in the technology development lifecycle.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	High	Very High
Communications*	Very High	Very High
Content Creation	Moderate	High
Human Capital, Culture, & Leadership	Moderate	High
Technology Lifecycle Activities	High	High
Testing and Validation**	Moderate	Low
Acquisition and Procurement	High	Moderate
Training	Very High	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	50% -90%	50% -90%	90% -99%	50% -90%	100%	90% -99%	90% -99%	100%	50% -90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	70% fully conform	30% fully conform	FY24	70% fully conform	30% fully conform	100% fully conform	80% fully conform
FY23	70% fully conform	0% fully conform	FY23	70% fully conform	0% fully conform	60% fully conform	60% fully conform

# Bureau of Indian Affairs

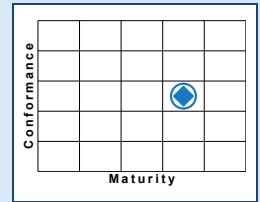
Department of the Interior

## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

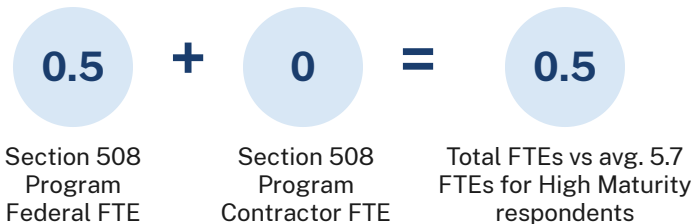
Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**5** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Low	Very High
Policies, Procedures & Practices	Very High	Very High
Communications	Very High	Moderate
Content Creation	High	High
Human Capital, Culture, & Leadership	Moderate	Low
Technology Lifecycle Activities	High	High
Testing and Validation	High	Moderate
Acquisition and Procurement	Very High	Moderate
Training*	Very High	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	50% -90%	50% -90%	90% -99%	50% -90%	100%	90% -99%	90% -99%	100%	50% -90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	100% fully conform	90% fully conform	FY24	0% fully conform	10% fully conform	30% fully conform	0% fully conform
FY23	84% fully conform	93% fully conform	FY23	Not Tested	20% fully conform	50% fully conform	60% fully conform



# Bureau of Indian Education

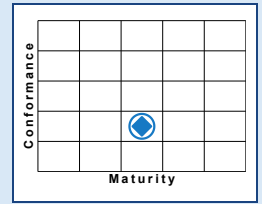
Department of the Interior

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

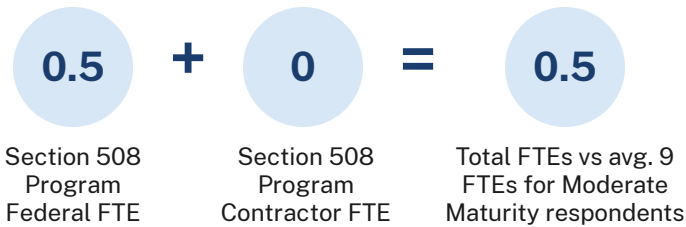
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**5** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very High
Policies, Procedures & Practices	Moderate	Moderate
Communications*	Very High	Low
Content Creation	Moderate	High
Human Capital, Culture, & Leadership**	Low	Low
Technology Lifecycle Activities	Low	Moderate
Testing and Validation	Moderate	High
Acquisition and Procurement	Low	Moderate
Training	Low	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	50% - 90%	50% - 90%	100%	90% - 99%	50% - 90%	100%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	100% fully conform	FY24	Not Tested	10% fully conform	10% fully conform	0% fully conform
FY23	Not Tested	89% fully conform	FY23	Not Tested	0% fully conform	30% fully conform	Not Applicable

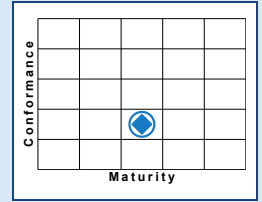


## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

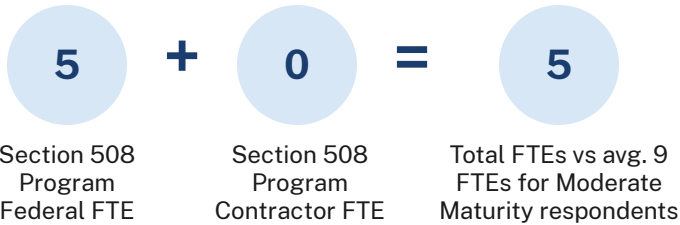
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**20** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	High
Policies, Procedures & Practices	Moderate	Moderate
Communications*	Very High	High
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	High	Low
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation	High	High
Acquisition and Procurement**	Low	Low
Training	High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	50% -90%	50% -90%	90% -99%	50% -90%	100%	N/A	90% -99%	90% -99%	50% -90%

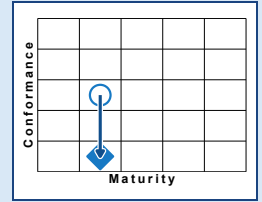
## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Unknown	FY24	Not Tested	Not Tested	40% fully conform	0% fully conform
FY23	Not Tested	50% fully conform	FY23	Not Tested	Not Tested	30% fully conform	0% fully conform

## Overall Performance

**Maturity: Low | Conformance: Very Low****Recommendations for Low Maturity, Very Low Conformance:**

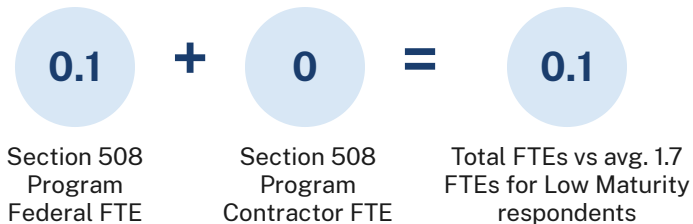
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



1

Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices	Very Low	Moderate
Communications*^	Very High	Very Low
Content Creation	Very High	Moderate
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Low	Low
Testing and Validation	Moderate	High
Acquisition and Procurement	Moderate	Moderate
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	50% -90%	50% -90%	50% -90%	50% -90%	100%	90% -99%	Unknown	100%	50% -90%

## ICT Testing Outcomes

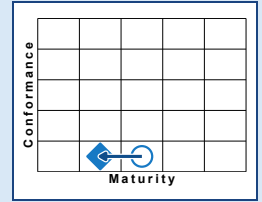
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	90% fully conform	90% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

## Overall Performance

**Maturity: Low | Conformance: Very Low**

**Recommendations for Low Maturity, Very Low Conformance:**

Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**15** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Moderate	High
Communications	Moderate	Low
Content Creation	Very Low	Low
Human Capital, Culture, & Leadership**	Very Low	Low
Technology Lifecycle Activities	Very Low	High
Testing and Validation	Very Low	Low
Acquisition and Procurement	Low	High
Training*	High	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	90% - 99%	90% - 99%	50% - 90%	Unknown	Unknown	90% - 99%	50% - 90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested





# Bureau of Safety and Environmental Enforcement

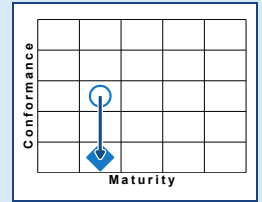
Department of the Interior

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

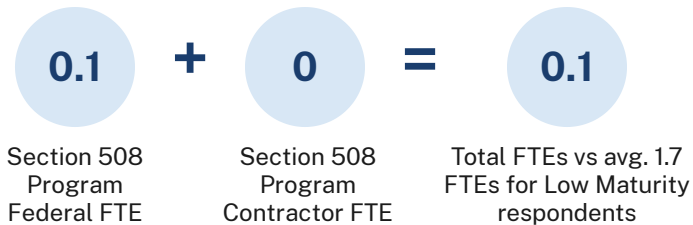
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**1** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices	Very Low	Moderate
Communications*^	Very High	Low
Content Creation	Very High	Moderate
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Low	Low
Testing and Validation	Moderate	High
Acquisition and Procurement	Moderate	Moderate
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	50% -90%	50% -90%	50% -90%	50% -90%	100%	90% -99%	Unknown	100%	50% -90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	90% fully conform	90% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested



# Bureau of Trust Funds Administration

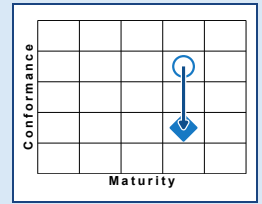
Department of the Interior

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

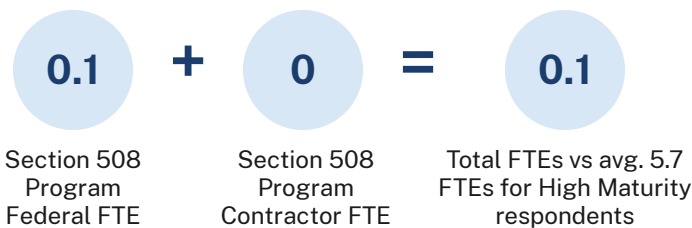
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**4** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Moderate	Moderate
Policies, Procedures & Practices	Moderate	High
Communications	High	Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	High	Moderate
Technology Lifecycle Activities	High	Very High
Testing and Validation	Moderate	Very High
Acquisition and Procurement*	Very High	Very High
Training	High	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	50% -90%	50% -90%	50% -90%	50% -90%	100%	90% -99%	N/A	100%	50% -90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	100% fully conform	100% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Applicable



# National Indian Gaming Commission

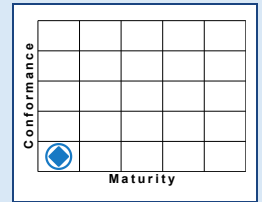
Department of the Interior

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

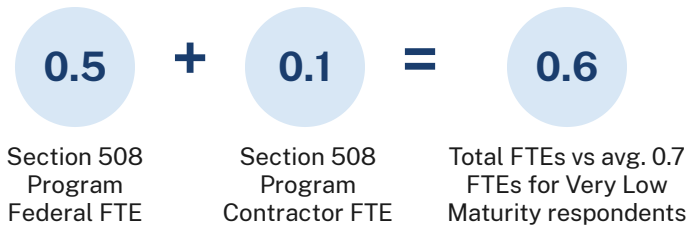
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Never integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices**	Very Low	Very Low
Communications	Low	Low
Content Creation**	Very Low	Very Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Very Low	Low
Testing and Validation**	Very Low	Very Low
Acquisition and Procurement	Low	Very Low
Training*	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	N/A	100%	N/A	100%	N/A	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	0% fully conform	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested



# National Park Service

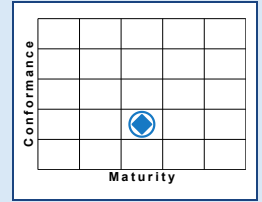
Department of the Interior

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

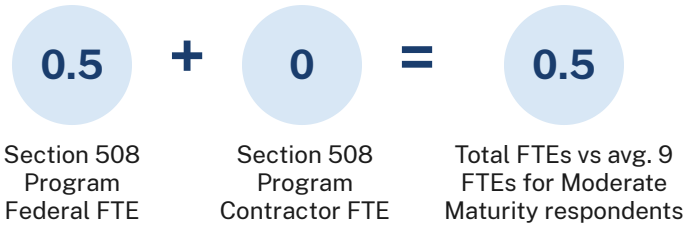
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**25** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices*	High	Moderate
Communications	Moderate	Low
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities	High	Low
Testing and Validation	Moderate	Moderate
Acquisition and Procurement**	Moderate	Low
Training	High	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	100%	90% - 99%	50% - 90%	Unknown	100%	100%	90% - 99%	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	10% fully conform	0% fully conform	FY24	0% fully conform	20% fully conform	70% fully conform	40% fully conform
FY23	90% fully conform	10% fully conform	FY23	20% fully conform	20% fully conform	10% fully conform	60% fully conform

# Office of Natural Resources Revenue

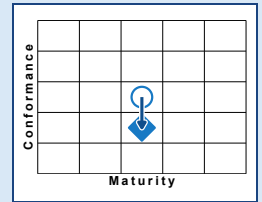
Department of the Interior

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

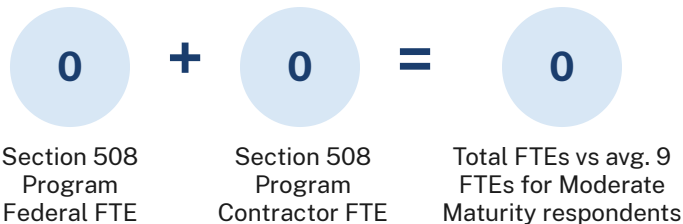
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Low
Policies, Procedures & Practices	Moderate	High
Communications*	Very High	Moderate
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Very High	High
Testing and Validation	High	Very High
Acquisition and Procurement	High	Moderate
Training	Low	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	50% -90%	50% -90%	90% -99%	50% -90%	100%	90% -99%	N/A	N/A	50% -90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	94% fully conform	0% fully conform	FY24	Not Tested	0% fully conform	10% fully conform	0% fully conform
FY23	99% fully conform	2% fully conform	FY23	30% fully conform	0% fully conform	90% fully conform	100% fully conform



# Office of Surface Mining Reclamation and Enforcement

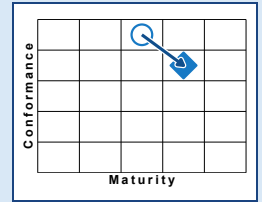
Department of the Interior

## Overall Performance

**Maturity: High | Conformance: High**

### Recommendations for High Maturity, High Conformance:

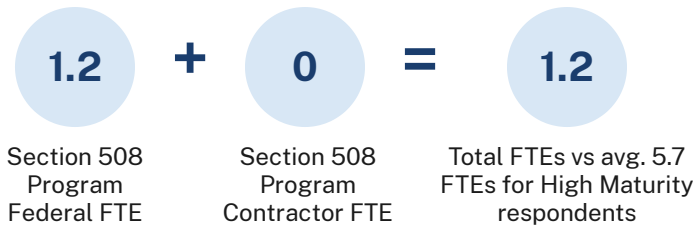
Those in the High-High overall performance category should consider a balanced approach to improving maturity, particularly around prioritizing risk in the technology development lifecycle.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is never integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	High	High
Communications	Very High	Moderate
Content Creation*	Very High	Moderate
Human Capital, Culture, & Leadership	High	Low
Technology Lifecycle Activities**	Very Low	Very High
Testing and Validation*	Very High	Moderate
Acquisition and Procurement	Low	High
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	50%-90%	50%-90%	90%-99%	50%-90%	100%	90%-99%	90%-99%	90%-99%	50%-90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	95% fully conform	98% fully conform	FY24	Not Tested	70% fully conform	100% fully conform	100% fully conform
FY23	97% fully conform	98% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	Not Applicable





# United States Fish and Wildlife Service

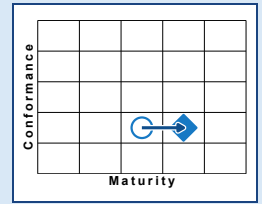
Department of the Interior

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

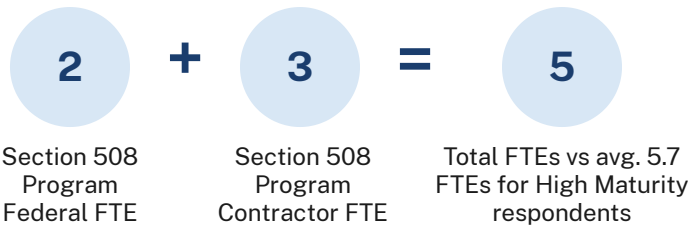
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**20** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	High	High
Communications	High	Moderate
Content Creation**	Low	Moderate
Human Capital, Culture, & Leadership	Very High	Low
Technology Lifecycle Activities	Very High	High
Testing and Validation**	Low	Low
Acquisition and Procurement*	Very High	Very High
Training	Very High	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	50% - 90%	50% - 90%	50% - 90%	50% - 90%	50% - 90%	50% - 90%	50% - 90%	100%	50% - 90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	0% fully conform	100% fully conform	20% fully conform
FY23	Not Tested	0% fully conform	FY23	Not Tested	10% fully conform	80% fully conform	40% fully conform



# United States Geological Survey

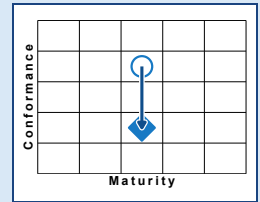
Department of the Interior

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

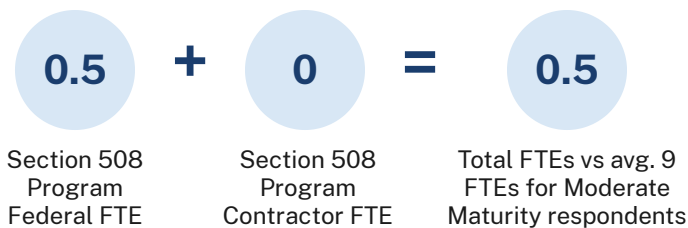
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not have a formal technology development lifecycle



**20** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	High	High
Communications	Low	Very High
Content Creation**	Low	High
Human Capital, Culture, & Leadership	Low	Moderate
Technology Lifecycle Activities*	High	High
Testing and Validation	Moderate	Moderate
Acquisition and Procurement	High	Moderate
Training	Moderate	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	Unknown	Unknown	50% - 90%	100%	90% - 99%	90% - 99%	100%	50% - 90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	0% fully conform	FY24	80% fully conform	80% fully conform	20% fully conform	0% fully conform
FY23	Not Tested	0% fully conform	FY23	100% fully conform	100% fully conform	40% fully conform	100% fully conform

## Department of the Treasury

- Department of the Treasury (TREAS)
- Alcohol and Tobacco Tax and Trade Bureau (ATTTB)
- Bureau of Engraving and Printing (BEP)
- Bureau of the Fiscal Service (BFS)
- Financial Crimes Enforcement Network (FINCEN)
- Internal Revenue Service (IRS)
- Office of Financial Research (OFR)\*
- Office of Inspector General (TREASOIG)
- Office of the Comptroller of the Currency (OCC)
- Special Inspector General for Pandemic Recovery (SIGPR)\*
- Treasury Inspector General for Tax Administration (TIGTA)
- United States Mint (MINT)

**Note:** Special Inspector General for the Troubled Asset Relief Program (SIGTARP) reported in FY23 but was closed due to expired statute.

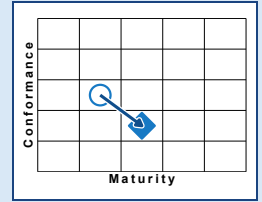
\*Entity only reported data in FY24

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

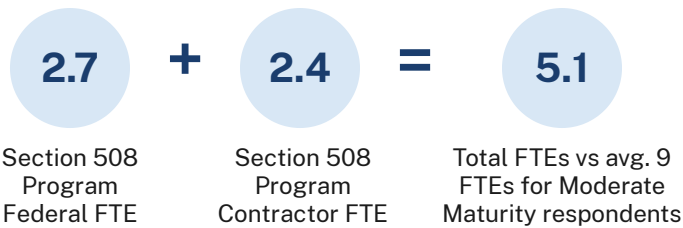
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Low
Policies, Procedures & Practices	Moderate	Moderate
Communications	Low	Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities*	High	Moderate
Testing and Validation	Moderate	Low
Acquisition and Procurement	Moderate	Moderate
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% - 90%	90% - 99%	90% - 99%	Unknown	90% - 99%	100%	Unknown	90% - 99%	50% - 90%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	83% fully conform	FY24	0% fully conform	70% fully conform	10% fully conform	100% fully conform
FY23	20% fully conform	78% fully conform	FY23	0% fully conform	40% fully conform	0% fully conform	100% fully conform

# Alcohol and Tobacco Tax and Trade Bureau

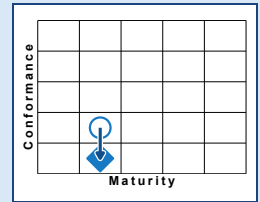
Department of the Treasury

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

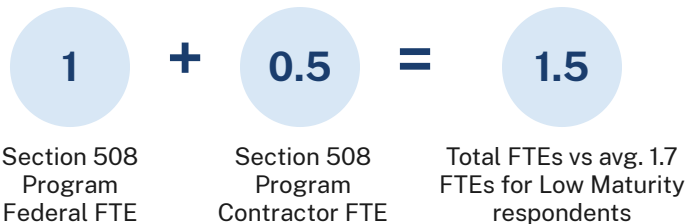
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**1** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices	High	Low
Communications	Very Low	Very Low
Content Creation	Moderate	Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation	Moderate	Low
Acquisition and Procurement*	High	Moderate
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	N/A	N/A	Unknown	90% - 99%	90% - 99%	Unknown	90% - 99%	Unknown	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	0% fully conform	FY24	Not Tested	0% fully conform	Not Tested	Not Tested
FY23	Not Tested	0% fully conform	FY23	Not Tested	0% fully conform	40% fully conform	100% fully conform

# Bureau of Engraving and Printing

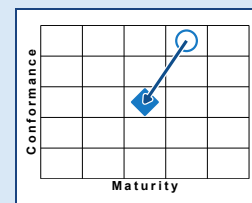
Department of the Treasury

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

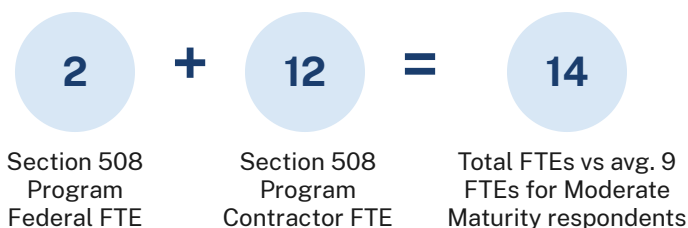
Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**10** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices**	Very Low	Moderate
Communications	Very High	Very High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities	Low	Low
Testing and Validation	High	High
Acquisition and Procurement	Moderate	High
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	<50%	N/A	<50%	100%	N/A	100%	100%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	100% fully conform	FY24	0% fully conform	0% fully conform	100% fully conform	100% fully conform
FY23	100% fully conform	100% fully conform	FY23	30% fully conform	100% fully conform	100% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-166

# Bureau of the Fiscal Service

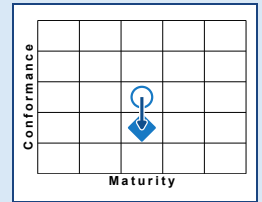
Department of the Treasury

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

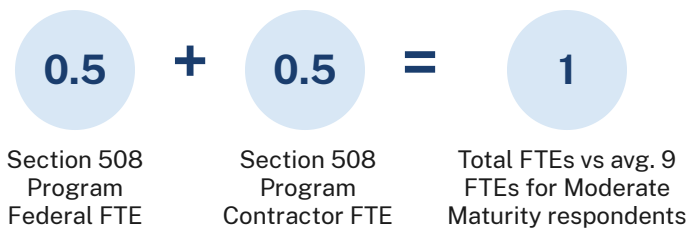
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Moderate
Policies, Procedures & Practices	Moderate	Low
Communications	Moderate	Moderate
Content Creation*	Very High	Moderate
Human Capital, Culture, & Leadership	Moderate	High
Technology Lifecycle Activities**	Moderate	Low
Testing and Validation	High	Moderate
Acquisition and Procurement	High	High
Training**	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	98% fully conform	FY24	Not Tested	0% fully conform	0% fully conform	0% fully conform
FY23	Not Tested	90% fully conform	FY23	Not Tested	0% fully conform	30% fully conform	100% fully conform

# Financial Crimes Enforcement Network

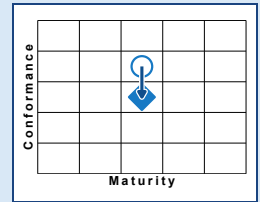
Department of the Treasury

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

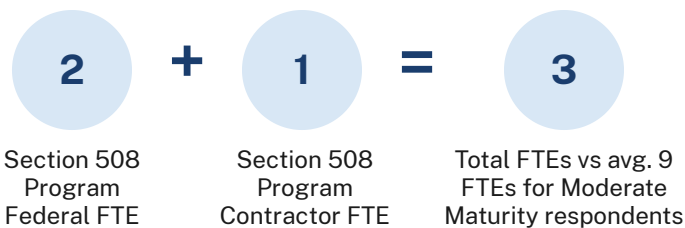
Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	Moderate
Policies, Procedures & Practices	Very High	High
Communications	Moderate	Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation	Moderate	Low
Acquisition and Procurement	Moderate	Low
Training**	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	90% - 99%	90% - 99%	90% - 99%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	93% fully conform	79% fully conform	FY24	10% fully conform	0% fully conform	0% fully conform	Not Applicable
FY23	93% fully conform	82% fully conform	FY23	0% fully conform	10% fully conform	70% fully conform	Not Applicable





# Internal Revenue Service

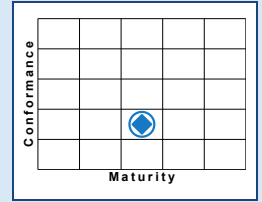
Department of the Treasury

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

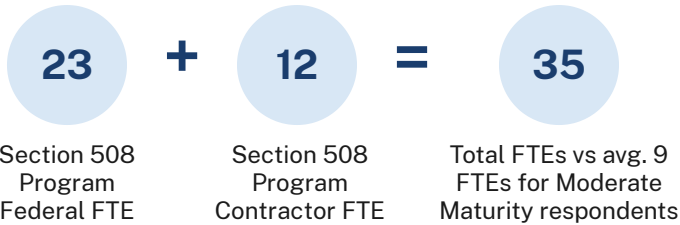
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	High
Policies, Procedures & Practices	Moderate	Moderate
Communications	Moderate	High
Content Creation*	High	Moderate
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities	Moderate	Low
Testing and Validation	Moderate	Moderate
Acquisition and Procurement	Moderate	Low
Training**	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
<50%	Unknown	Unknown	90%-99%	<50%	90%-99%	50%-90%	50%-90%	90%-99%	50%-90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	75% fully conform	FY24	Not Tested	0% fully conform	Not Tested	Not Tested
FY23	Not Tested	77% fully conform	FY23	Not Tested	100% fully conform	100% fully conform	Not Tested

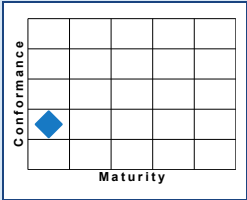
Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-169

Overall Performance

Maturity: Very Low | Conformance: Low

Recommendations for Very Low Maturity, Low Conformance:

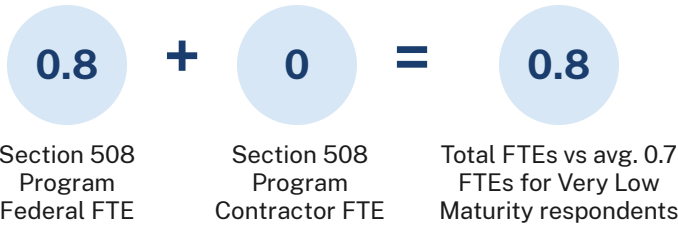
Those in the Very Low-Low overall performance category have several areas where they may invest to improve accessibility. However, as no reporting entity in this category had an established Section 508 program, fully establishing a Section 508 program would likely be a significant first step



FY24 FY23

Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



0 Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Very Low	No Data
Policies, Procedures & Practices**	Very Low	No Data
Communications	Low	No Data
Content Creation*	High	No Data
Human Capital, Culture, & Leadership	Low	No Data
Technology Lifecycle Activities	Very Low	No Data
Testing and Validation	Low	No Data
Acquisition and Procurement	Very Low	No Data
Training**	Very Low	No Data

\* Highest in FY24 \*\* Lowest in FY24  
^ does not perform dimension function

How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
<50%	Unknown	Unknown	100%	100%	N/A	<50%	N/A	N/A	100%

ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	30% fully conform	FY24	Not Tested	Not Tested	50% fully conform	Not Tested
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data



# Office of Inspector General

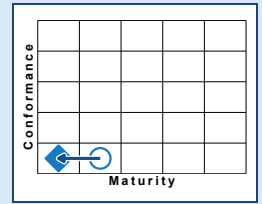
Department of the Treasury

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

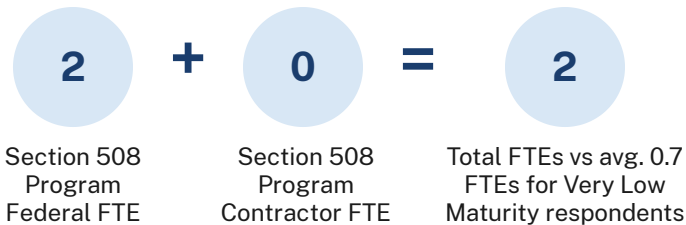
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Very Low
Policies, Procedures & Practices**	Very Low	Very Low
Communications	Very Low	Very Low
Content Creation*	Low	Very Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Very Low	Very High
Testing and Validation	Very Low	Very Low
Acquisition and Procurement*	Low	Low
Training	Very Low	Very Low

\* Highest in FY24    \*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	Unknown	N/A	N/A	Unknown	Unknown	N/A	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-171

# Office of the Comptroller of the Currency

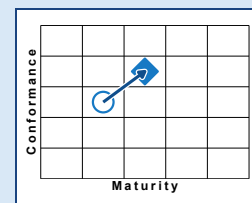
Department of the Treasury

## Overall Performance

**Maturity: Moderate | Conformance: High**

### Recommendations for Moderate Maturity, High Conformance:

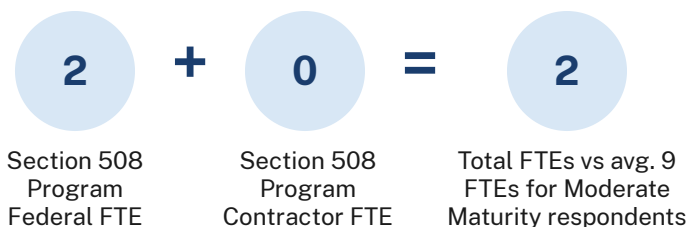
Although overall performing moderately well in the Acquisition and Procurement maturity dimension, those in the Moderate-High overall performance category should continue to develop capabilities to verify the accessibility of contract deliverables as well as improving their Section 508 training planning and capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**12** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices	Moderate	Low
Communications**	Low	Low
Content Creation	Moderate	Low
Human Capital, Culture, & Leadership	Moderate	Very Low
Technology Lifecycle Activities	Moderate	Low
Testing and Validation	Moderate	Moderate
Acquisition and Procurement*	High	Moderate
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	100%	90% -99%	100%	Unknown	50% -90%	Unknown	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	80% fully conform	100% fully conform	FY24	80% fully conform	90% fully conform	10% fully conform	60% fully conform
FY23	Not Tested	90% fully conform	FY23	90% fully conform	80% fully conform	0% fully conform	0% fully conform



# Special Inspector General for Pandemic Recovery

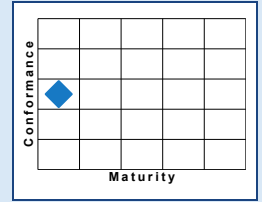
Department of the Treasury

## Overall Performance

**Maturity: Very Low | Conformance: Moderate**

### Recommendations for Very Low Maturity, Moderate Conformance:

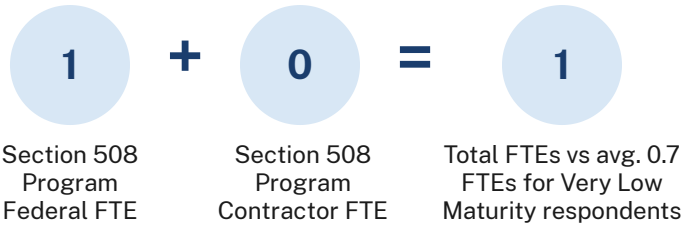
Those in the Very Low-Moderate overall performance category should invest in establishing a Section 508 Program Office at the entity, as well as establishing a baseline for those activities that are currently not being performed – specifically accessibility-related activities aligned to Training, Communications and Policies, Procedures, and Practices.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Does not know how Section 508 reviews are integrated into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Moderate	No Data
Policies, Procedures & Practices**	Very Low	No Data
Communications	Very Low	No Data
Content Creation	Very Low	No Data
Human Capital, Culture, & Leadership	Very Low	No Data
Technology Lifecycle Activities	Low	No Data
Testing and Validation	Very Low	No Data
Acquisition and Procurement	Very Low	No Data
Training	Very Low	No Data

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	N/A	N/A	N/A	N/A	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Unknown	FY24	Not Applicable	0% fully conform	0% fully conform	Not Applicable
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data



# Treasury Inspector General for Tax Administration

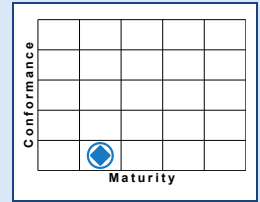
Department of the Treasury

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

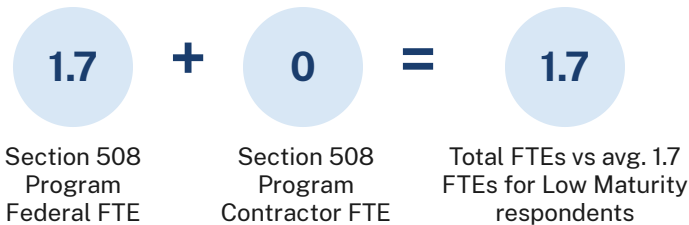
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**5** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices	Moderate	Very Low
Communications**	Very Low	Low
Content Creation*	Moderate	Very Low
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Very Low	High
Testing and Validation	Low	Very Low
Acquisition and Procurement	Moderate	Moderate
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	50% - 90%	<50%	N/A	50% - 90%	50% - 90%	Unknown	50% - 90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	0% fully conform	0% fully conform	Not Tested	0% fully conform

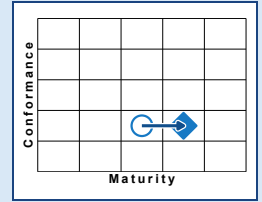


## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

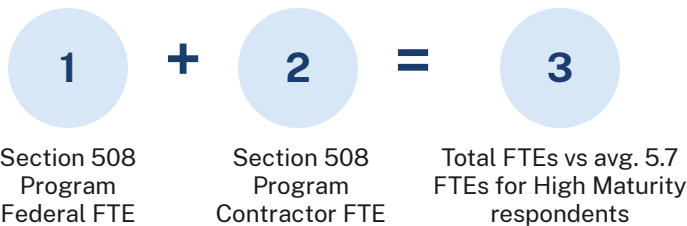
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**8** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	High
Policies, Procedures & Practices	Moderate	Moderate
Communications	Very High	High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	Moderate	Very Low
Technology Lifecycle Activities	Moderate	High
Testing and Validation	Moderate	High
Acquisition and Procurement	High	Moderate
Training**	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	90% - 99%	Unknown	100%	100%	90% - 99%	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	6% fully conform	98% fully conform	FY24	0% fully conform	10% fully conform	100% fully conform	Not Tested
FY23	Not Tested	92% fully conform	FY23	Not Tested	0% fully conform	100% fully conform	Not Tested



## Department of Transportation

- Department of Transportation (DOT)
- Bureau of Transportation Statistics (BTS)\*
- Office of Inspector General (DOTOIG)\*
- Federal Aviation Administration (FAA)
- Federal Highway Administration (FHWA)
- Federal Motor Carrier Safety Administration (FMCSA)
- Federal Railroad Administration (FRA)
- Federal Transit Administration (FTA)
- Great Lakes St. Lawrence Seaway Development Corporation (GLS)
- John A. Volpe National Transportation Systems Center (VOLPE)\*
- Maritime Administration (MARAD)
- National Highway Traffic Safety Administration (NHTSA)
- Pipeline and Hazardous Materials Safety Administration (PHMSA)

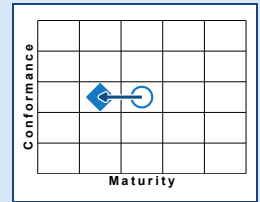
\*Entity only reported data in FY24

## Overall Performance

**Maturity: Low | Conformance: Moderate**

### Recommendations for Low Maturity, Moderate Conformance:

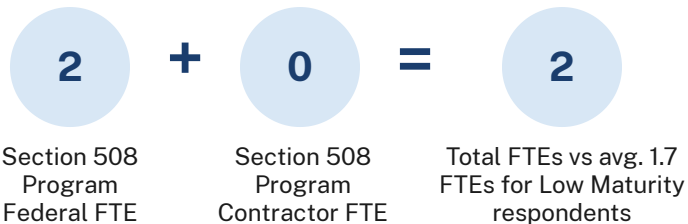
Those in the Low-Moderate overall performance category should continue to invest in establishing processes for creating accessible communications as well as addressing accessibility in acquisition within the entity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Moderate	Low
Communications*	High	Moderate
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership	Low	Moderate
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation	Low	High
Acquisition and Procurement	Low	High
Training**	Very Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	90%-99%	90%-99%	100%	Unknown	100%	Unknown	90%-99%	90%-99%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	84% fully conform	88% fully conform	FY24	0% fully conform	0% fully conform	10% fully conform	66.7% fully conform
FY23	89% fully conform	81% fully conform	FY23	0% fully conform	0% fully conform	30% fully conform	80% fully conform



# Bureau of Transportation Statistics

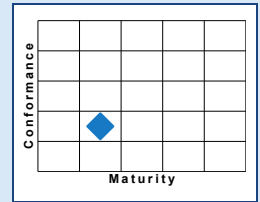
Department of Transportation

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



0 Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	No Data
Policies, Procedures & Practices	Very Low	No Data
Communications	Very Low	No Data
Content Creation*	High	No Data
Human Capital, Culture, & Leadership**	Very Low	No Data
Technology Lifecycle Activities	Low	No Data
Testing and Validation	Very Low	No Data
Acquisition and Procurement	High	No Data
Training	Low	No Data

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	Unknown	N/A	Unknown	N/A	100%	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	0% fully conform	FY24	Not Applicable	0% fully conform	0% fully conform	0% fully conform
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-178



# DOT Office of Inspector General

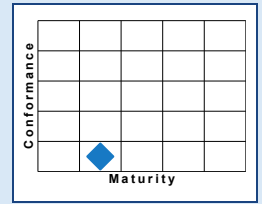
Department of Transportation

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

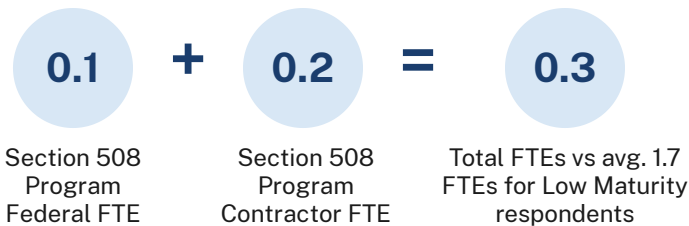
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Does not have a formal technology development lifecycle



**0** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	No Data
Policies, Procedures & Practices**	Very Low	No Data
Communications	Moderate	No Data
Content Creation	High	No Data
Human Capital, Culture, & Leadership	Low	No Data
Technology Lifecycle Activities*^	Very High	No Data
Testing and Validation	Low	No Data
Acquisition and Procurement	Low	No Data
Training	Very Low	No Data

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% -90%	Unknown	Unknown	N/A	Unknown	N/A	Unknown	N/A	100%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Not Tested	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-179

# Federal Aviation Administration

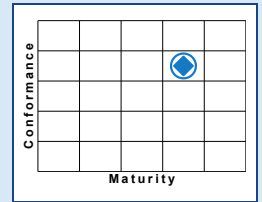
Department of Transportation

## Overall Performance

**Maturity: High | Conformance: High**

### Recommendations for High Maturity, High Conformance:

Those in the High-High overall performance category should consider a balanced approach to improving maturity, particularly around prioritizing risk in the technology development lifecycle.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices	Moderate	High
Communications	Moderate	Moderate
Content Creation	High	High
Human Capital, Culture, & Leadership	Moderate	High
Technology Lifecycle Activities**	Low	Low
Testing and Validation	High	Very High
Acquisition and Procurement*	Very High	Very High
Training	High	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% - 90%	100%	100%	50% - 90%	50% - 90%	100%	100%	100%	Unknown	50% - 90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	96% fully conform	FY24	Not Tested	100% fully conform	100% fully conform	100% fully conform
FY23	96% fully conform	96% fully conform	FY23	Not Tested	100% fully conform	100% fully conform	100% fully conform

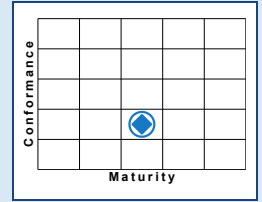
Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-180

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

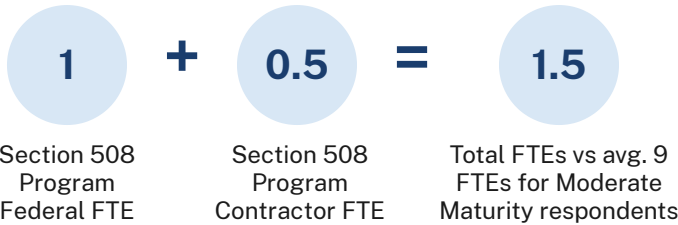
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	50%-90%	50%-90%	100%	50%-90%	100%	Unknown	Unknown	100%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	0% fully conform	0% fully conform	100% fully conform	0% fully conform
FY23	Not Tested	75% fully conform	FY23	0% fully conform	0% fully conform	50% fully conform	0% fully conform



# Federal Motor Carrier Safety Administration

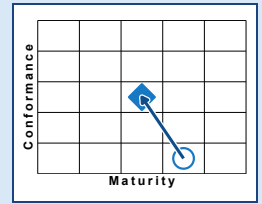
Department of Transportation

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

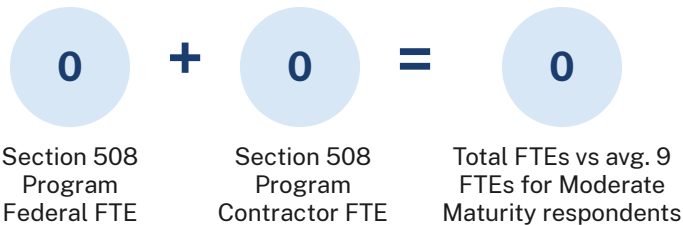
Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



4

Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Low	Moderate
Policies, Procedures & Practices	Moderate	Very High
Communications	Moderate	Very High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities**	Low	Moderate
Testing and Validation	High	Moderate
Acquisition and Procurement	High	Very High
Training**	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	100%	100%	50% - 90%	90% - 99%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	90% fully conform	89% fully conform	FY24	Not Tested	0% fully conform	Not Tested	0% fully conform
FY23	0% fully conform	0% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested



# Federal Railroad Administration

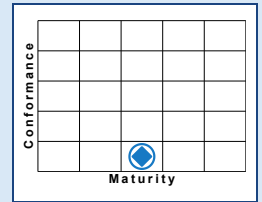
Department of Transportation

## Overall Performance

**Maturity: Moderate | Conformance: Very Low**

**Recommendations for Moderate Maturity, Very Low Conformance:**

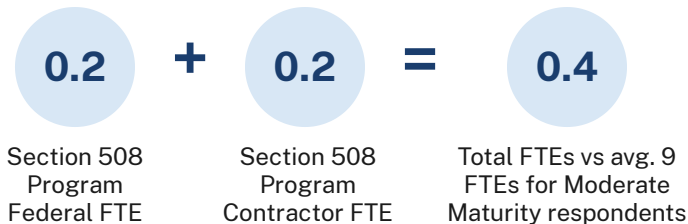
Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Moderate
Policies, Procedures & Practices	Moderate	Very High
Communications*	High	High
Content Creation	Moderate	High
Human Capital, Culture, & Leadership	Low	Moderate
Technology Lifecycle Activities*	High	Low
Testing and Validation	Low	Low
Acquisition and Procurement	Moderate	High
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	0% fully conform	0% fully conform	0% fully conform	0% fully conform
FY23	Not Tested	Not Tested	FY23	0% fully conform	0% fully conform	0% fully conform	0% fully conform



Federal Transit  
Administration

# Federal Transit Administration

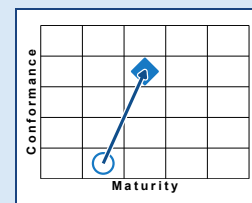
Department of Transportation

## Overall Performance

**Maturity: Moderate | Conformance: High**

### Recommendations for Moderate Maturity, High Conformance:

Although overall performing moderately well in the Acquisition and Procurement maturity dimension, those in the Moderate-High overall performance category should continue to develop capabilities to verify the accessibility of contract deliverables as well as improving their Section 508 training planning and capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.

2.5

+

1.5

=

4

Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 9  
FTEs for Moderate  
Maturity respondents

15

Hours per week spent by 508 PM vs avg. 20.5  
hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Low	Very Low
Communications	Low	Low
Content Creation*	Very High	Moderate
Human Capital, Culture, & Leadership**	Very Low	Low
Technology Lifecycle Activities	High	Low
Testing and Validation*	Very High	High
Acquisition and Procurement	Very High	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	100%	100%	N/A	N/A	N/A	N/A	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	Unknown	FY24	Not Applicable	Not Applicable	Not Applicable	Not Applicable
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-184

# Great Lakes St. Lawrence Seaway Development Corporation

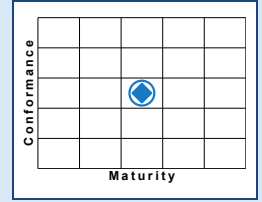
Department of Transportation

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.

135

+

0.5

=

135.5

Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 9  
FTEs for Moderate  
Maturity respondents

2

Hours per week spent by 508 PM vs avg. 20.5  
hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Low	Very Low
Communications**	Low	Very High
Content Creation	High	Low
Human Capital, Culture, & Leadership	Low	Very Low
Technology Lifecycle Activities	Low	High
Testing and Validation	Moderate	High
Acquisition and Procurement*	High	Moderate
Training	Moderate	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100%	N/A

## ICT Testing Outcomes

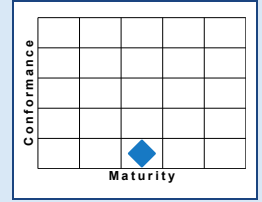
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	100% fully conform	FY24	Not Applicable	0% fully conform	Not Tested	Not Tested
FY23	Not Tested	100% fully conform	FY23	Not Applicable	Not Tested	Not Tested	Not Applicable

## Overall Performance

**Maturity: Moderate | Conformance: Very Low**

**Recommendations for Moderate Maturity, Very Low Conformance:**

Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**20** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	No Data
Policies, Procedures & Practices**	Very Low	No Data
Communications	Very Low	No Data
Content Creation	Moderate	No Data
Human Capital, Culture, & Leadership	Low	No Data
Technology Lifecycle Activities	Moderate	No Data
Testing and Validation	High	No Data
Acquisition and Procurement*	Very High	No Data
Training	Low	No Data

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	100%	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	80% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data

# Maritime Administration

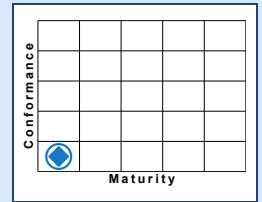
Department of Transportation

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

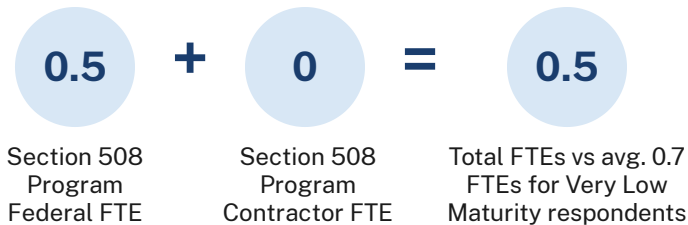
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Very Low	Very Low
Policies, Procedures & Practices	Very Low	Very Low
Communications*	Low	Very Low
Content Creation	Very Low	Very Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Low	Very High
Testing and Validation**	Very Low	Very Low
Acquisition and Procurement	Very Low	Very Low
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	100%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

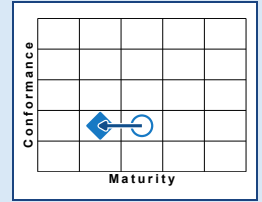
Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-187

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

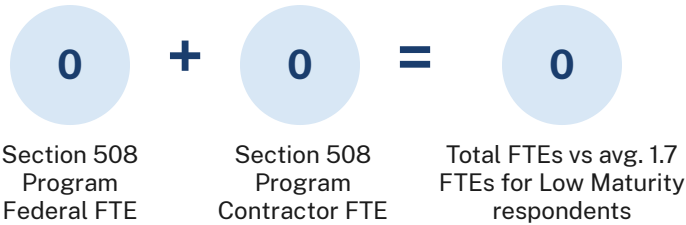
Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices**	Very Low	Moderate
Communications	Low	Very High
Content Creation	Moderate	High
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Very Low	High
Testing and Validation*	Moderate	Moderate
Acquisition and Procurement	Moderate	Very High
Training**	Very Low	Very Low

\* Highest in FY24 \*\* Lowest in FY24  
^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	90% - 99%	Unknown	N/A	50% - 90%	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	75% fully conform	FY24	Not Tested	0% fully conform	0% fully conform	100% fully conform
FY23	Not Tested	75% fully conform	FY23	Not Tested	0% fully conform	0% fully conform	0% fully conform



# Pipeline and Hazardous Materials Safety Administration

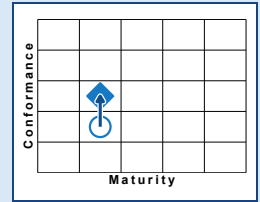
Department of Transportation

## Overall Performance

**Maturity: Low | Conformance: Moderate**

### Recommendations for Low Maturity, Moderate Conformance:

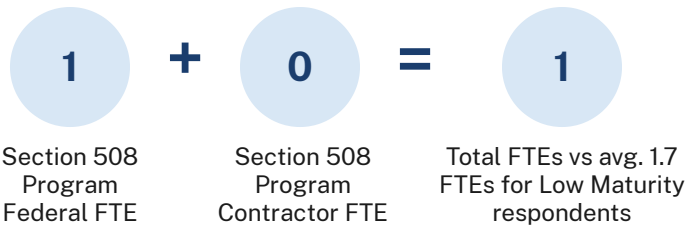
Those in the Low-Moderate overall performance category should continue to invest in establishing processes for creating accessible communications as well as addressing accessibility in acquisition within the entity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



2

Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Very Low	Low
Policies, Procedures & Practices	Low	Very Low
Communications	Low	Very Low
Content Creation*	Moderate	Low
Human Capital, Culture, & Leadership	Low	Very Low
Technology Lifecycle Activities	Very Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Very Low
Training	Very Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	90% - 99%	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	81.1% fully conform	FY24	Not Applicable	0% fully conform	Not Applicable	Not Applicable
FY23	Not Tested	80% fully conform	FY23	Not Applicable	70% fully conform	Not Tested	Not Tested



## Department of Veterans Affairs

---

- Department of Veterans Affairs (VA)

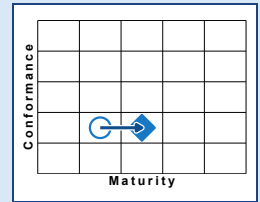
**Note:** Board of Veterans Appeals (BVA), National Cemetery Administration (NCA), Veterans Benefits Administration (VBA), and Veterans Health Administration (VHA) reported in FY23 but were combined into one VA submission for FY24.

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	High	Moderate
Policies, Procedures & Practices	High	Moderate
Communications*	High	Low
Content Creation	Moderate	Low
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities	Low	Moderate
Testing and Validation	Moderate	Low
Acquisition and Procurement**	Low	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
<50%	90%-99%	90%-99%	90%-99%	50%-90%	100%	Unknown	90%-99%	<50%	50%-90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	10% fully conform	70% fully conform	40% fully conform	0% fully conform
FY23	Not Tested	10% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

# Environmental Protection Agency

---

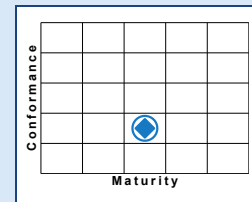
- Environmental Protection Agency (EPA)

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

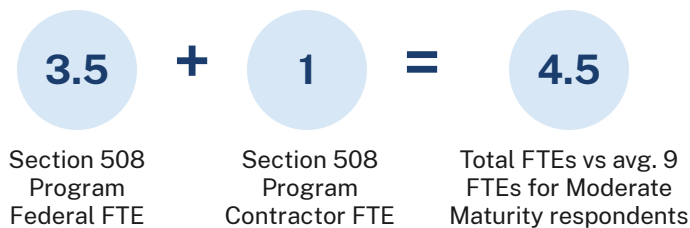
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	High
Policies, Procedures & Practices*	Moderate	High
Communications	Moderate	High
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership**	Low	High
Technology Lifecycle Activities**	Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement	Moderate	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	90%-99%	100%	100%	90%-99%	100%	90%-99%	50%-90%	100%	50%-90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	20% fully conform	66% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	93% fully conform	FY23	Not Tested	Not Tested	Not Tested	0% fully conform

# General Services Administration

---

- General Services Administration (GSA)

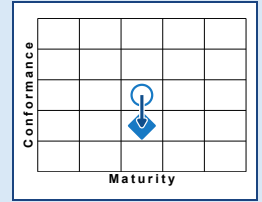
# General Services Administration

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

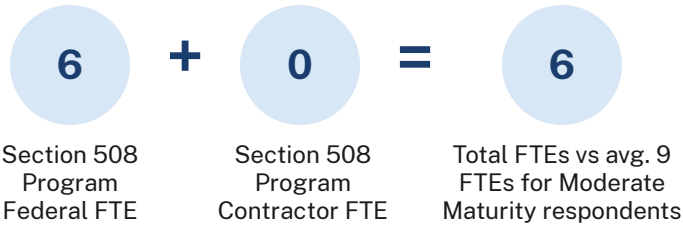
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	Moderate	High
Communications*	High	Moderate
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	High	High
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation	Moderate	Moderate
Acquisition and Procurement**	Low	Low
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% -90%	Unknown	50% -90%	90% -99%	90% -99%	90% -99%	100%	50% -90%	Unknown	50% -90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	0% fully conform	100% fully conform	0% fully conform	100% fully conform
FY23	92% fully conform	86% fully conform	FY23	30% fully conform	20% fully conform	Not Tested	0% fully conform

# National Aeronautics and Space Administration

---

- National Aeronautics and Space Administration (NASA)



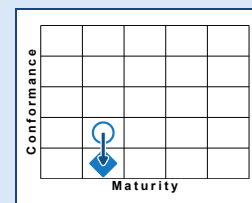
# National Aeronautics and Space Administration

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.

2.5

+

0.3

=

2.8

Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 1.7  
FTEs for Low Maturity  
respondents

**40** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Moderate
Policies, Procedures & Practices*	High	High
Communications	Low	Low
Content Creation	Low	Low
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities**	Very Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Low
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% - 90%	N/A	Unknown	90% - 99%	Unknown	100%	N/A	90% - 99%	<50%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	0% fully conform	0% fully conform	10% fully conform	0% fully conform
FY23	Not Tested	68% fully conform	FY23	10% fully conform	0% fully conform	0%	20% fully conform

# National Science Foundation

---

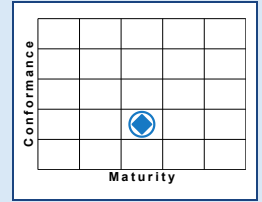
- National Science Foundation (NSF)

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

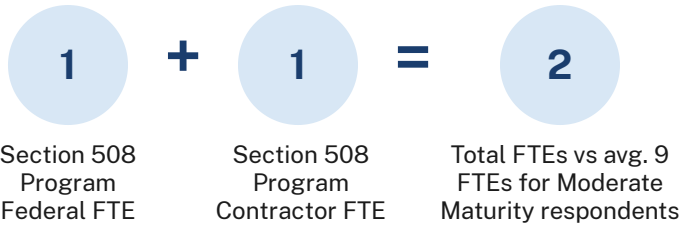
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**32** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Moderate
Policies, Procedures & Practices	Moderate	Moderate
Communications*	Very High	High
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities**	Low	High
Testing and Validation	High	Moderate
Acquisition and Procurement	Moderate	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90%-99%	100%	50%-90%	90%-99%	<50%	N/A	50%-90%	50%-90%	100%	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	89% fully conform	FY24	0% fully conform	Not Tested	Not Tested	0% fully conform
FY23	0% fully conform	89% fully conform	FY23	0% fully conform	Not Tested	Not Tested	0% fully conform

# Nuclear Regulatory Commission

---

- Nuclear Regulatory Commission (NRC)

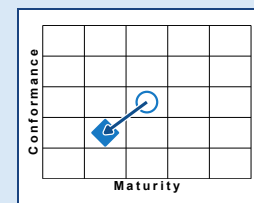
# Nuclear Regulatory Commission

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**32** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices*	High	Very High
Communications	Moderate	Low
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Low	Moderate
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Low
Training	Moderate	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90%-99%	90%-99%	Unknown	100%	<50%	50%-90%	100%	50%-90%	50%-90%	50%-90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	98% fully conform	FY24	Not Tested	0% fully conform	0% fully conform	0% fully conform
FY23	100% fully conform	98% fully conform	FY23	100% fully conform	100% fully conform	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-201

# Office of Personnel Management

---

- Office of Personnel Management (OPM)

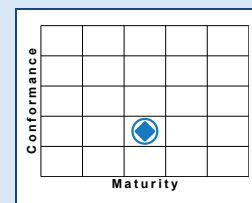
# Office of Personnel Management

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.

2.5

+

0

=

2.5

Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 9  
FTEs for Moderate  
Maturity respondents

**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	Moderate	Moderate
Communications	High	Moderate
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	Moderate	Very High
Technology Lifecycle Activities	Moderate	Low
Testing and Validation	Moderate	Moderate
Acquisition and Procurement**	Low	Low
Training	High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	50%-90%	90%-99%	100%	50%-90%	100%	50%-90%	100%	100%	90%-99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	Unknown	FY24	0% fully conform	40% fully conform	90% fully conform	0% fully conform
FY23	0% fully conform	94% fully conform	FY23	0% fully conform	14.% fully conform	40% fully conform	20% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-203



# Small Business Administration

---

- Small Business Administration (SBA)

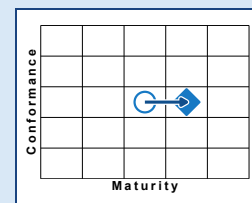
# Small Business Administration

## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

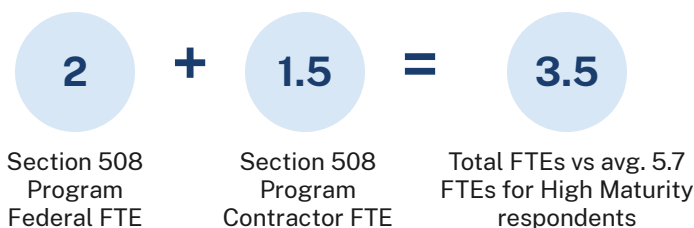
Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	Moderate
Policies, Procedures & Practices**	Moderate	Low
Communications	High	Moderate
Content Creation*	Very High	High
Human Capital, Culture, & Leadership**	Moderate	Very Low
Technology Lifecycle Activities**	Moderate	Moderate
Testing and Validation	Very High	Moderate
Acquisition and Procurement	High	Moderate
Training**	Moderate	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	<50%	100%	90% -99%	N/A	100%	50% -90%	100%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	65% fully conform	59% fully conform	FY24	0% fully conform	100% fully conform	30% fully conform	0% fully conform
FY23	Not Tested	63% fully conform	FY23	100% fully conform	100% fully conform	60% fully conform	0% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-205

# Social Security Administration

---

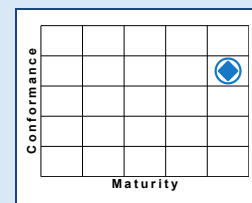
- Social Security Administration (SSA)

## Overall Performance

**Maturity: Very High | Conformance: High**

### Recommendations for Very High Maturity, High Conformance:

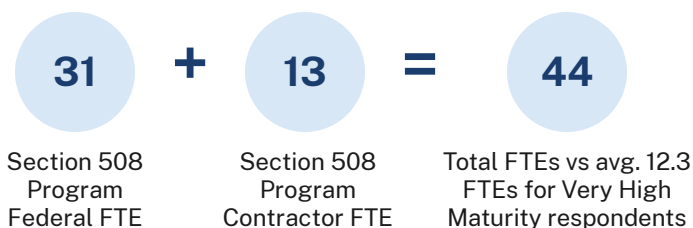
Those in the Very High-High overall performance category should continue to make incremental improvements particularly in their testing and remediation efforts due to the variability in conformance results.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 35 hours for Very High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	Very High
Policies, Procedures & Practices**	Very High	Very High
Communications	Very High	Very High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	Very High	Very High
Technology Lifecycle Activities*	Very High	Very High
Testing and Validation**	Very High	Very High
Acquisition and Procurement*	Very High	Very High
Training	Very High	Very High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% - 99%	50% - 90%	50% - 90%	90% - 99%	50% - 90%	N/A	90% - 99%	100%	100%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	99% fully conform	84% fully conform	FY24	Not Tested	100% fully conform	90% fully conform	100% fully conform
FY23	100% fully conform	90% fully conform	FY23	Not Tested	100% fully conform	Not Tested	100% fully conform

# U.S. Agency for International Development

---

- U.S. Agency for International Development (USAID)

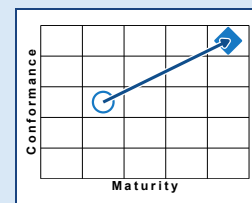
# U.S. Agency for International Development

## Overall Performance

**Maturity: Very High | Conformance: Very High**

### Recommendations for Very High Maturity, Very High Conformance:

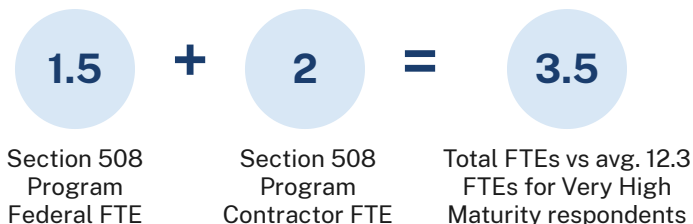
Those in the Very High-Very High overall performance category should continue to make incremental improvements particularly in their testing and remediation efforts due to the variability in some of their conformance results.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**20** Hours per week spent by 508 PM vs avg. 35 hours for Very High Maturity respondents

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	100%	100%	90%-99%	100%	100%	100%	90%-99%	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	100% fully conform	100% fully conform	FY24	100% fully conform	100% fully conform	100% fully conform	100% fully conform
FY23	Not Tested	76% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-209

# Small and Independent Agencies and Reporting Entities

- Administrative Conference of the United States (ACUS)
- American Battle Monuments Commission (ABMC)
- Chemical Safety and Hazard Investigation Board (CSHIB)
- Commodity Futures Trading Commission (CFTC)
- Consumer Financial Protection Bureau (CFPB)
- Consumer Product Safety Commission (CPSC)
- Corporation for National and Community Service (CNCS)
- Court Services and Offender Supervision Agency (CSOSA)\*
- Defense Nuclear Facilities Safety Board (DNFSB)\*
- Delta Regional Authority (DRA)
- Election Assistance Commission (EAC)
- Equal Employment Opportunity Commission (EEOC)
- Export-Import Bank of the United States (EXIM)
- Farm Credit Administration (FCA)
- Farm Credit System Insurance Corporation (FCSIC)
- Federal Communications Commission (FCC)
- Federal Deposit Insurance Corporation (FDIC)
- Federal Energy Regulatory Commission (FERC)
- Federal Housing Finance Agency (FHFA)
- Federal Labor Relations Authority (FLRA)
- Federal Maritime Commission (FMC)
- Federal Mediation and Conciliation Service (FMCS)
- Federal Mine Safety and Health Review Commission (FMSHRC)
- Federal Retirement Thrift Investment Board (FRTIB)
- Federal Trade Commission (FTC)
- Gulf Coast Ecosystem Restoration Council (GCERC)
- Institute of Museum and Library Services (IMLS)
- Inter-American Foundation (IAF)
- International Trade Commission (ITC)
- James Madison Memorial Fellowship Foundation (JMMFF)
- Marine Mammal Commission (MMC)
- Merit Systems Protection Board (MSPB)
- Millennium Challenge Corporation (MCC)
- Morris K. Udall and Stewart L. Udall Foundation (MUSUF)



# Small and Independent Agencies and Reporting Entities

- National Archives and Records Administration (NARA)
- National Capital Planning Commission (NCPC)
- National Council on Disability (NCD)
- National Credit Union Administration (NCUA)
- National Endowment for the Arts (NEA)
- National Endowment for the Humanities (NEH)
- National Labor Relations Board (NLRB)
- National Mediation Board (NMB)
- National Transportation Safety Board (NTSB)
- Nuclear Waste Technical Review Board (NWTRB)
- Occupational Safety and Health Review Commission (OSHRC)
- Office of Government Ethics (OGE)
- Office of Navajo and Hopi Indian Relocation (ONHIR)
- Office of Special Counsel (OSC)
- Peace Corps (PC )
- Pension Benefit Guaranty Corporation (PBGC)
- Postal Regulatory Commission (PRC)
- Presidio Trust (PT)\*
- Privacy and Civil Liberties Oversight Board (PCLOB)
- Railroad Retirement Board (RRB)
- Securities and Exchange Commission (SEC)
- Selective Service System (SSS)
- Tennessee Valley Authority (TVA)
- U.S. Access Board (USAB)
- U.S. Agency for Global Media (USAGM)
- U.S. Commission on Civil Rights (USCCR)
- U.S. International Development Finance Corporation (DFC)
- U.S. Postal Service (USPS)
- U.S. Trade and Development Agency (USTDA)\*

**Note:** Commission for the Preservation of America's Heritage Abroad (CPAHA), Commission of Fine Arts (CFA), Denali Commission (DC), Harry S Truman Scholarship Foundation (HSTSF), and Surface Transportation Board (STB) reported in FY23 but not FY24.

\*Entity only reported data in FY24

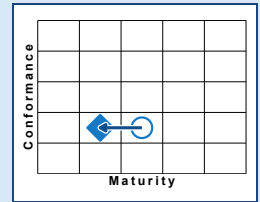
# Administrative Conference of the United States

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

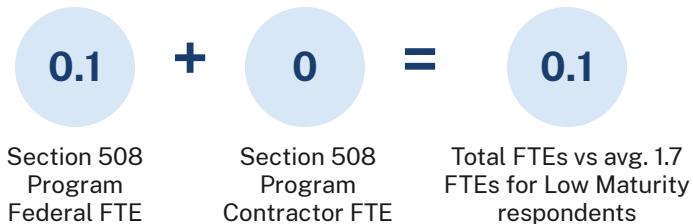
Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



1

Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Moderate
Policies, Procedures & Practices	Low	High
Communications	High	Moderate
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities	Low	Very High
Testing and Validation	Very Low	Very Low
Acquisition and Procurement*	High	High
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	Unknown	N/A	100%	N/A	Unknown	90%-99%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	Unknown	FY24	Not Applicable	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Applicable	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-212



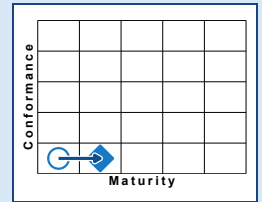
# American Battle Monuments Commission

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

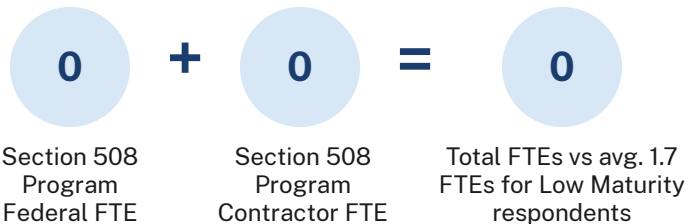
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices**	Very Low	Low
Communications*^	Very High	Very Low
Content Creation	Low	Very Low
Human Capital, Culture, & Leadership	Low	Very Low
Technology Lifecycle Activities	Very Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Low
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-213

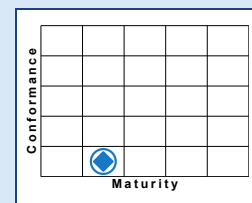
# Chemical Safety and Hazard Investigation Board

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Does not know how Section 508 reviews are integrated into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not have a formal technology development lifecycle



**1** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Very Low
Policies, Procedures & Practices	Moderate	Low
Communications	Low	High
Content Creation**	Very Low	Low
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities*	Moderate	Very High
Testing and Validation	Very Low	Very Low
Acquisition and Procurement	Low	Moderate
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	50% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

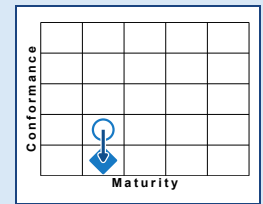
# Commodity Futures Trading Commission

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

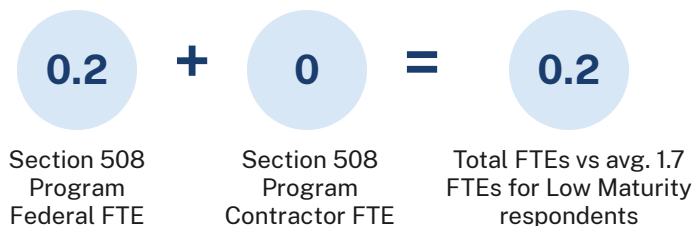
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**8** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Moderate	Low
Communications**	Very Low	Moderate
Content Creation	Low	Low
Human Capital, Culture, & Leadership*	Moderate	Low
Technology Lifecycle Activities**	Very Low	High
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Moderate
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	90%-99%	Unknown	100%	100%	90%-99%	Unknown	50%-90%	50%-90%	90%-99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Unknown	FY24	0% fully conform	0% fully conform	0% fully conform	0% fully conform
FY23	50% fully conform	Not Tested	FY23	0% fully conform	Not Tested	67% fully conform	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-215

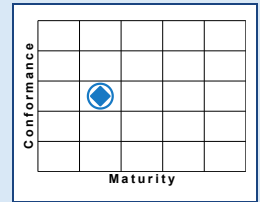
# Consumer Financial Protection Bureau

## Overall Performance

**Maturity: Low | Conformance: Moderate**

### Recommendations for Low Maturity, Moderate Conformance:

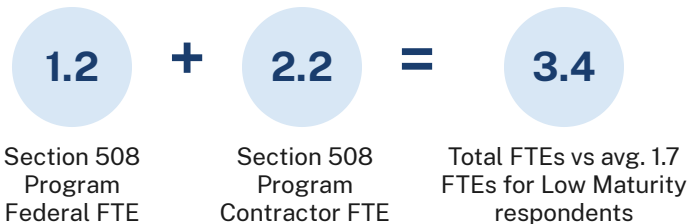
Those in the Low-Moderate overall performance category should continue to invest in establishing processes for creating accessible communications as well as addressing accessibility in acquisition within the entity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Moderate	Moderate
Policies, Procedures & Practices	Moderate	Moderate
Communications	Low	Very Low
Content Creation**	Very Low	Low
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Very Low	Very Low
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Low
Training	Moderate	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	100%	100%	Unknown	100%	90% -99%	100%	N/A	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	100% fully conform	FY24	0% fully conform	70% fully conform	100% fully conform	0% fully conform
FY23	75% fully conform	100% fully conform	FY23	0% fully conform	40% fully conform	20% fully conform	0% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-216

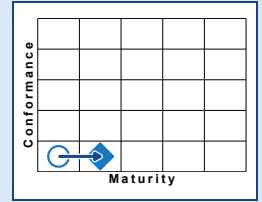
# Consumer Product Safety Commission

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

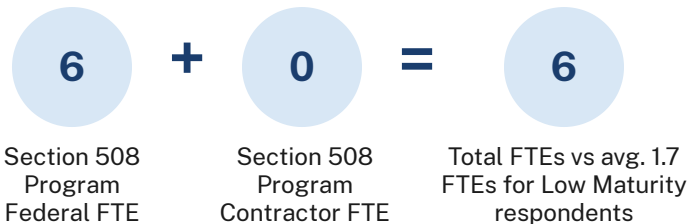
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Does not know how Section 508 reviews are integrated into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**3** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Very Low	Very Low
Communications*^	Very High	Very Low
Content Creation**	Very Low	Very Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Very Low	Low
Testing and Validation**	Very Low	Very Low
Acquisition and Procurement	Very Low	Low
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	100%	Unknown	Unknown	100%	Unknown	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	1% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

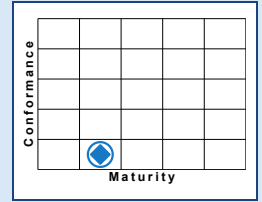


## Overall Performance

**Maturity: Low | Conformance: Very Low**

**Recommendations for Low Maturity, Very Low Conformance:**

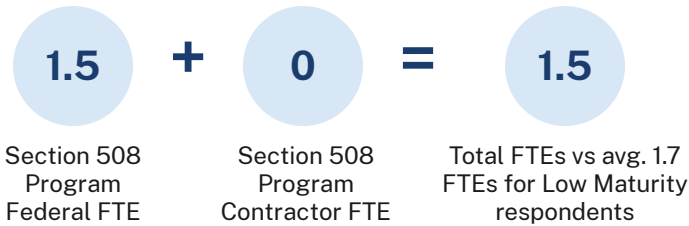
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**4** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Moderate	Very High
Communications*	High	Low
Content Creation	Low	Very Low
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities	Low	Low
Testing and Validation	Moderate	Very Low
Acquisition and Procurement**	Very Low	Moderate
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	100%	90% -99%	Unknown	90% -99%	<50%	<50%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	3% fully conform	FY24	Not Tested	20% fully conform	0% fully conform	0% fully conform
FY23	Not Tested	16% fully conform	FY23	0% fully conform	10% fully conform	0% fully conform	Not Tested



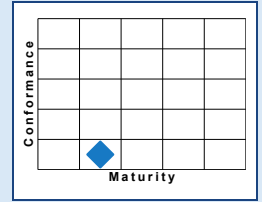
# Court Services and Offender Supervision Agency

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

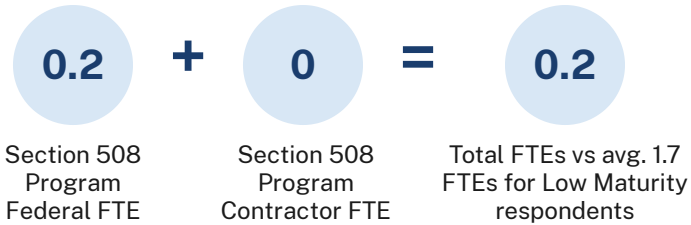
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	No Data
Policies, Procedures & Practices	Low	No Data
Communications*	Moderate	No Data
Content Creation	Low	No Data
Human Capital, Culture, & Leadership	Very Low	No Data
Technology Lifecycle Activities	Very Low	No Data
Testing and Validation	Moderate	No Data
Acquisition and Procurement	Very Low	No Data
Training**	Very Low	No Data

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	100%	100%	Unknown	90% - 99%	Unknown	Unknown	Unknown	Unknown	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data

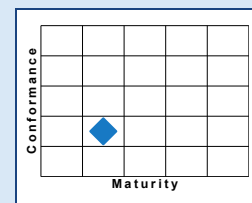
# Defense Nuclear Facilities Safety Board

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

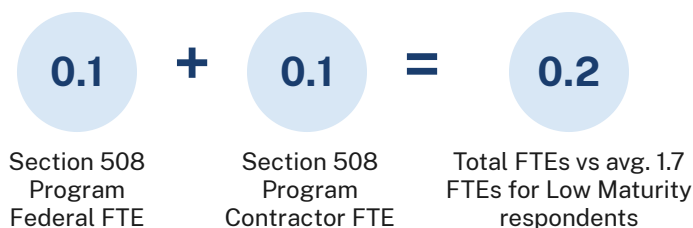
Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**0.1** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	No Data
Policies, Procedures & Practices**	Very Low	No Data
Communications	Very Low	No Data
Content Creation*	Moderate	No Data
Human Capital, Culture, & Leadership	Very Low	No Data
Technology Lifecycle Activities	Low	No Data
Testing and Validation	Low	No Data
Acquisition and Procurement	Low	No Data
Training	Low	No Data

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	Unknown	Unknown	100%	100%	N/A	N/A	Unknown	100%	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	100% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-220

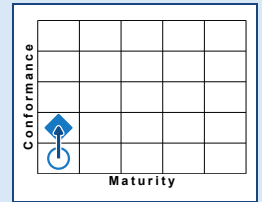


## Overall Performance

**Maturity: Very Low | Conformance: Low**

### Recommendations for Very Low Maturity, Low Conformance:

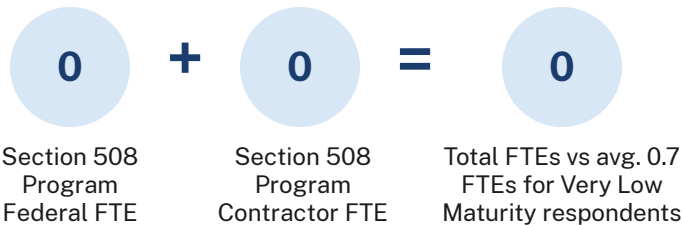
Those in the Very Low-Low overall performance category have several areas where they may invest to improve accessibility. However, as no reporting entity in this category had an established Section 508 program, fully establishing a Section 508 program would likely be a significant first step



◆ FY24 ○ FY23

## Program Highlights

- Q42: Never integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Very Low	Very Low
Policies, Procedures & Practices**	Very Low	Very Low
Communications*	Moderate	Very Low
Content Creation**	Very Low	Very Low
Human Capital, Culture, & Leadership	Low	Very Low
Technology Lifecycle Activities	Low	Very Low
Testing and Validation**	Very Low	Very Low
Acquisition and Procurement**	Very Low	Low
Training**	Very Low	Very Low

\* Highest in FY24 \*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	N/A	N/A	N/A	N/A	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	Unknown	FY24	Not Applicable	Not Tested	Not Tested	Not Tested
FY23	Not Tested	10% fully conform	FY23	Not Applicable	Not Tested	Not Tested	Not Tested

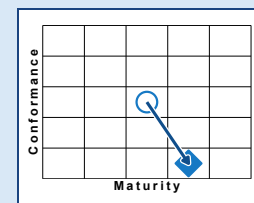
# Election Assistance Commission

## Overall Performance

**Maturity: High | Conformance: Very Low**

### Recommendations for High Maturity, Very Low Conformance:

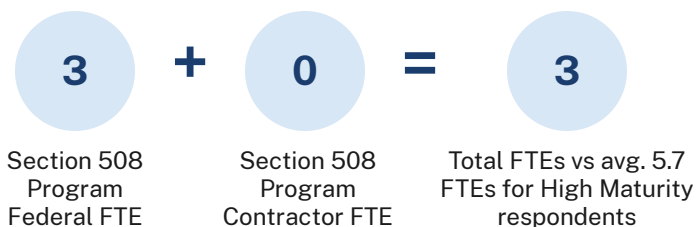
Given relatively high maturity outcomes and a preponderance of responses stating they do not have resources to test for conformance, those in the High-Very Low overall performance category should consider dedicating significant resources to developing testing processes and capabilities and focusing on testing and remediation to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	High
Policies, Procedures & Practices	Moderate	High
Communications	High	Very High
Content Creation	Moderate	Very High
Human Capital, Culture, & Leadership**	Low	Low
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation*	Very High	High
Acquisition and Procurement	High	Low
Training	Moderate	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% - 99%	90% - 99%	90% - 99%	90% - 99%	50% - 90%	N/A	90% - 99%	90% - 99%	Unknown	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	100% fully conform	100% fully conform	FY23	0% fully conform	0% fully conform	0% fully conform	0% fully conform

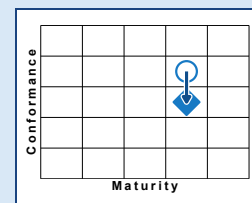
# Equal Employment Opportunity Commission

## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

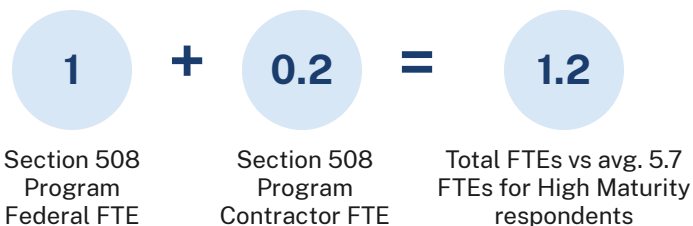
Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**10** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	High
Policies, Procedures & Practices	Moderate	High
Communications	Very High	High
Content Creation	Very High	Very High
Human Capital, Culture, & Leadership**	Low	Low
Technology Lifecycle Activities	Very High	High
Testing and Validation	Very High	Moderate
Acquisition and Procurement	Moderate	High
Training	Moderate	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90%-99%	90%-99%	90%-99%	100%	Unknown	N/A	100%	100%	100%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	3% fully conform	100% fully conform	FY24	50% fully conform	90% fully conform	70% fully conform	0% fully conform
FY23	10% fully conform	10% fully conform	FY23	100% fully conform	100% fully conform	100% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-223





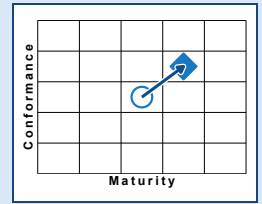
# Export-Import Bank of the United States

## Overall Performance

**Maturity: High | Conformance: High**

### Recommendations for High Maturity, High Conformance:

Those in the High-High overall performance category should consider a balanced approach to improving maturity, particularly around prioritizing risk in the technology development lifecycle.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.

0.25

+

0

=

0.25

Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 5.7  
FTEs for High Maturity  
respondents

2

Hours per week spent by 508 PM vs avg. 23  
hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices	High	High
Communications**	Moderate	Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	Very High	Moderate
Technology Lifecycle Activities	Very High	Moderate
Testing and Validation*	Very High	Moderate
Acquisition and Procurement	Very High	Moderate
Training	High	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	100%	90% -99%	90% -99%	90% -99%	100%	90% -99%	100%	100%	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	100% fully conform	100% fully conform	FY24	100% fully conform	Not Tested	Not Tested	100% fully conform
FY23	95% fully conform	65% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested



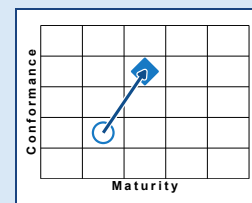
# Farm Credit Administration

## Overall Performance

**Maturity: Moderate | Conformance: High**

### Recommendations for Moderate Maturity, High Conformance:

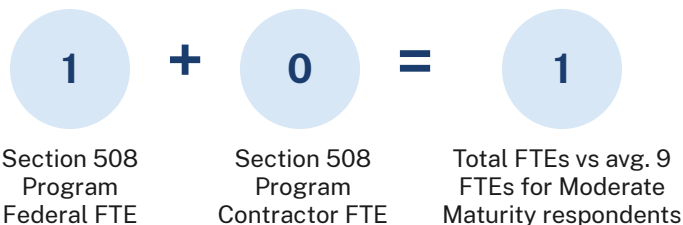
Although overall performing moderately well in the Acquisition and Procurement maturity dimension, those in the Moderate-High overall performance category should continue to develop capabilities to verify the accessibility of contract deliverables as well as improving their Section 508 training planning and capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**10** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	Moderate	Moderate
Communications	High	Low
Content Creation	Moderate	High
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	High	Low
Testing and Validation*	High	Moderate
Acquisition and Procurement	Low	Low
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% - 90%	50% - 90%	50% - 90%	50% - 90%	50% - 90%	100%	50% - 90%	N/A	90% - 99%	N/A

## ICT Testing Outcomes

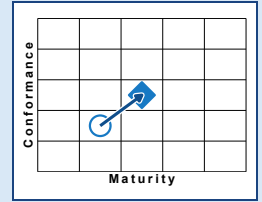
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	95% fully conform	FY24	100% fully conform	100% fully conform	20% fully conform	100%
FY23	Not Tested	93% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

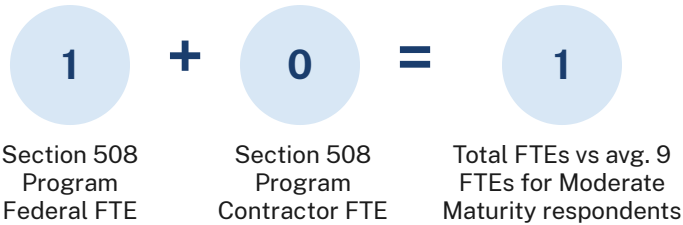
Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**10** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	Moderate	Moderate
Communications	High	Low
Content Creation	Moderate	High
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	High	Low
Testing and Validation*	Very High	Moderate
Acquisition and Procurement	Low	Low
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	50% - 90%	N/A	90% - 99%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	90% fully conform	FY24	80% fully conform	100% fully conform	Not Tested	Not Tested
FY23	Not Tested	93% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

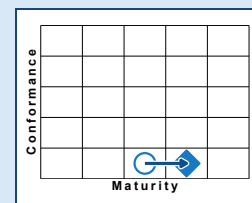
# Federal Communications Commission

## Overall Performance

**Maturity: High | Conformance: Very Low**

### Recommendations for High Maturity, Very Low Conformance:

Given relatively high maturity outcomes and a preponderance of responses stating they do not have resources to test for conformance, those in the High-Very Low overall performance category should consider dedicating significant resources to developing testing processes and capabilities and focusing on testing and remediation to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 5.7  
FTEs for High Maturity  
respondents

**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	High
Policies, Procedures & Practices	Very High	High
Communications	Very High	Low
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities	Very High	High
Testing and Validation	High	High
Acquisition and Procurement**	Moderate	Moderate
Training	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% - 90%	50% - 90%	N/A	50% - 90%	50% - 90%	100%	50% - 90%	90% - 99%	<50%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	0% fully conform	FY24	0% fully conform	0% fully conform	0% fully conform	0% fully conform
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

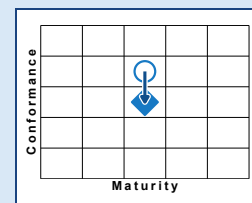
# Federal Deposit Insurance Corporation

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 9  
FTEs for Moderate  
Maturity respondents

**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	Very High	High
Policies, Procedures & Practices	High	High
Communications**	Low	Very Low
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership**	Low	Low
Technology Lifecycle Activities**	Low	Low
Testing and Validation	Moderate	Low
Acquisition and Procurement	Low	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	90% - 99%	90% - 99%	100%	50% - 90%	50% - 90%	Unknown	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	97% fully conform	0% fully conform	FY24	50% fully conform	40% fully conform	70% fully conform	0% fully conform
FY23	94% fully conform	96% fully conform	FY23	40% fully conform	40% fully conform	80% fully conform	0% fully conform

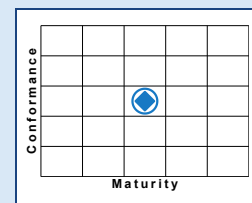
# Federal Energy Regulatory Commission

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

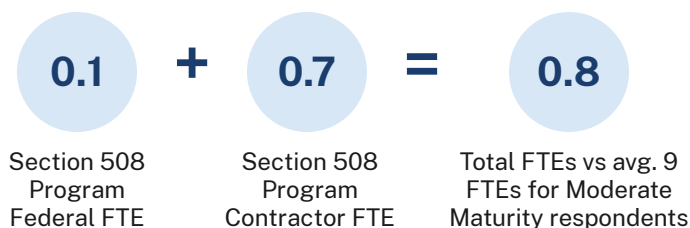
Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Moderate
Policies, Procedures & Practices	High	High
Communications	Very High	Moderate
Content Creation	Moderate	High
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities	Moderate	Low
Testing and Validation	Moderate	Moderate
Acquisition and Procurement**	Very Low	Very Low
Training*	Very High	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% - 90%	90% - 99%	90% - 99%	100%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	50% - 90%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	20% fully conform	70% fully conform	0% fully conform	100% fully conform
FY23	10% fully conform	98% fully conform	FY23	10% fully conform	80% fully conform	0% fully conform	100% fully conform

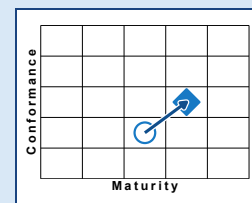
# Federal Housing Finance Agency

## Overall Performance

**Maturity: High | Conformance: Moderate**

### Recommendations for High Maturity, Moderate Conformance:

Those in the High-Moderate overall performance category should consider a balanced approach to improving maturity and conformance-related activities, including the expansion of testing capability and resourcing and improving training maturity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	Very High
Policies, Procedures & Practices	Very High	Moderate
Communications*	Very High	Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership*	Very High	High
Technology Lifecycle Activities**	Low	Low
Testing and Validation	High	Moderate
Acquisition and Procurement	High	Very High
Training	High	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	100%	100%	90% -99%	100%	50% -90%	100%	N/A	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	40% fully conform	60% fully conform	FY24	10% fully conform	60% fully conform	60% fully conform	40% fully conform
FY23	Not Tested	0% fully conform	FY23	30% fully conform	0% fully conform	50% fully conform	0% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-230



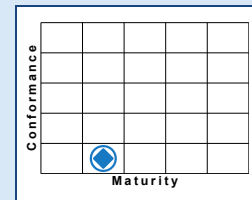
# Federal Labor Relations Authority

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

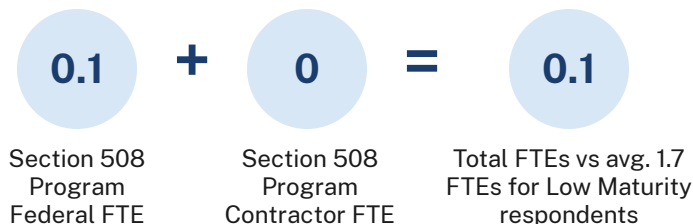
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**0.1** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Low
Policies, Procedures & Practices	Low	Moderate
Communications	Very Low	Low
Content Creation	High	Low
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities	Low	Moderate
Testing and Validation	Moderate	Very Low
Acquisition and Procurement*	Very High	Low
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	Unknown	N/A	N/A	N/A	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Not Tested	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-231

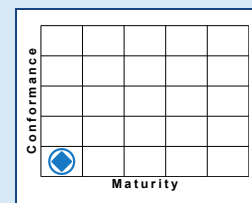


## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

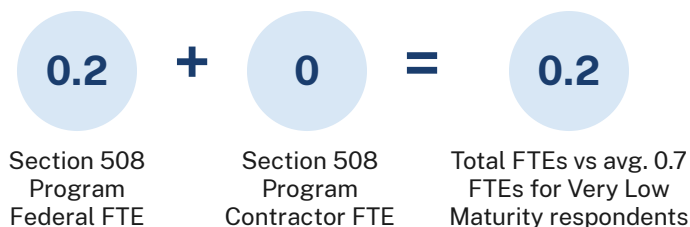
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**0.5** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices	Very Low	Very Low
Communications*	High	Low
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Very Low	Low
Testing and Validation	Very Low	Low
Acquisition and Procurement**	Very Low	Very Low
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90%-99%	N/A	N/A	100%	100%	N/A	N/A	Unknown	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Not Tested	FY24	Not Tested	Not Tested	Not Tested	0% fully conform
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

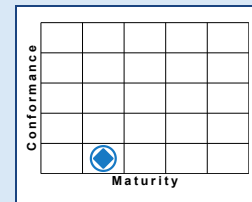
# Federal Mediation and Conciliation Service

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

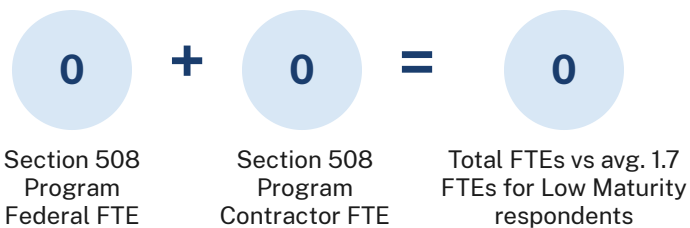
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Does not have a formal technology development lifecycle



2

Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices	Moderate	Low
Communications**	Very Low	Very Low
Content Creation	Low	Very Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	High	High
Testing and Validation**	Very Low	Very Low
Acquisition and Procurement*	High	High
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	100%	90% -99%	100%	100%	100%	100%	Unknown	Unknown	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Not Tested	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-233

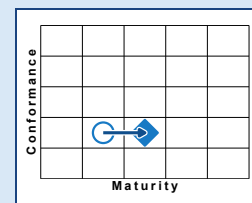
# Federal Mine Safety and Health Review Commission

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**4** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Very Low
Policies, Procedures & Practices	Very Low	Very Low
Communications	High	Low
Content Creation	Low	High
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Very High	High
Testing and Validation*^	Very High	Moderate
Acquisition and Procurement*	Very High	High
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	100%	100%	100%	Unknown	<50%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	25% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	Not Tested	90% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

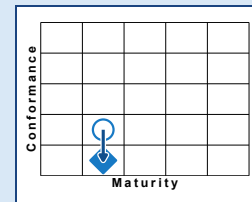
# Federal Retirement Thrift Investment Board

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

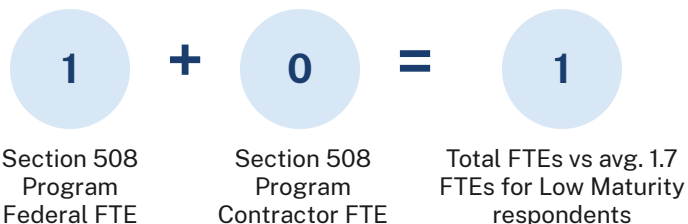
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**20** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Low
Policies, Procedures & Practices*	High	Moderate
Communications	Moderate	Very Low
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Low	Low
Testing and Validation	Moderate	Low
Acquisition and Procurement	Very Low	Low
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	100%	Unknown	100%	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	70% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

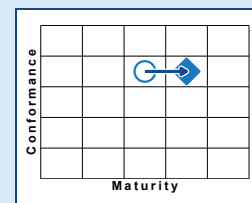
Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-235

## Overall Performance

**Maturity: High | Conformance: High**

### Recommendations for High Maturity, High Conformance:

Those in the High-High overall performance category should consider a balanced approach to improving maturity, particularly around prioritizing risk in the technology development lifecycle.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Does not have a formal technology development lifecycle



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 5.7  
FTEs for High Maturity  
respondents

**20** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	Moderate
Policies, Procedures & Practices	Moderate	High
Communications*	Very High	Very Low
Content Creation	High	Moderate
Human Capital, Culture, & Leadership	Moderate	Low
Technology Lifecycle Activities	High	Moderate
Testing and Validation	High	High
Acquisition and Procurement**	Moderate	Low
Training	Moderate	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	100%	100%	100%	100%	100%	100%	90%-99%	100%	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	43% fully conform	99% fully conform	FY24	100% fully conform	90% fully conform	20% fully conform	0% fully conform
FY23	39% fully conform	99% fully conform	FY23	70% fully conform	0% fully conform	20% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-236

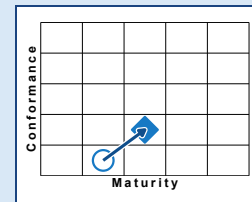
# Gulf Coast Ecosystem Restoration Council

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

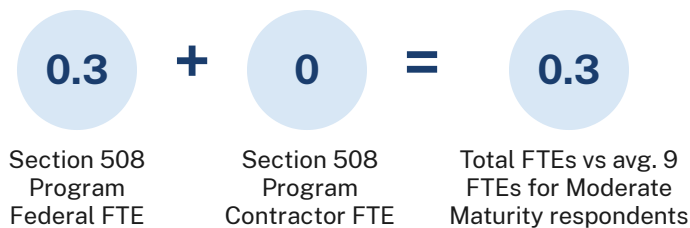
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not have a formal technology development lifecycle



1

Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Very Low
Policies, Procedures & Practices	Very Low	Low
Communications	High	Moderate
Content Creation	Moderate	Low
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Very High	High
Testing and Validation	Moderate	Moderate
Acquisition and Procurement*	Very High	Very High
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	N/A	N/A	<50%	N/A	N/A	N/A	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	Unknown	FY24	Not Applicable	Not Tested	Not Tested	Not Tested
FY23	Not Tested	0% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

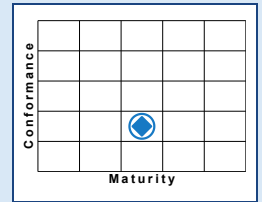
Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-237

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

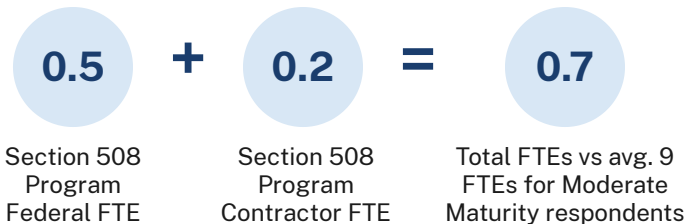
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**3** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Low
Policies, Procedures & Practices	Low	High
Communications**	Very Low	Very Low
Content Creation	Moderate	Moderate
Human Capital, Culture, & Leadership*	High	Low
Technology Lifecycle Activities	Moderate	High
Testing and Validation	High	Moderate
Acquisition and Procurement	High	High
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	90%-99%	100%	100%	90%-99%	100%	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	10% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	0% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested



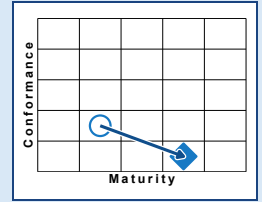


## Overall Performance

**Maturity: High | Conformance: Very Low**

### Recommendations for High Maturity, Very Low Conformance:

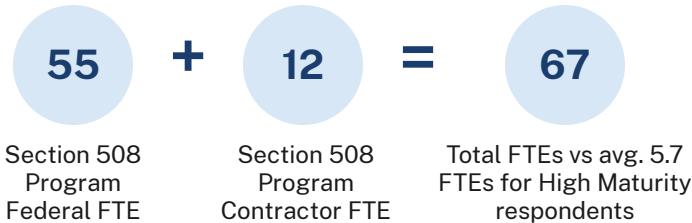
Given relatively high maturity outcomes and a preponderance of responses stating they do not have resources to test for conformance, those in the High-Very Low overall performance category should consider dedicating significant resources to developing testing processes and capabilities and focusing on testing and remediation to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Very Low
Policies, Procedures & Practices	Very High	Very Low
Communications*	Very High	Low
Content Creation*	Very High	Low
Human Capital, Culture, & Leadership	High	Low
Technology Lifecycle Activities	Very High	Moderate
Testing and Validation**	Very Low	Very Low
Acquisition and Procurement	Moderate	Low
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	N/A	N/A	50% - 90%	N/A	50% - 90%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	100%	Not Tested	Not Tested	Not Tested



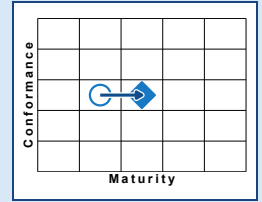
# International Trade Commission

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

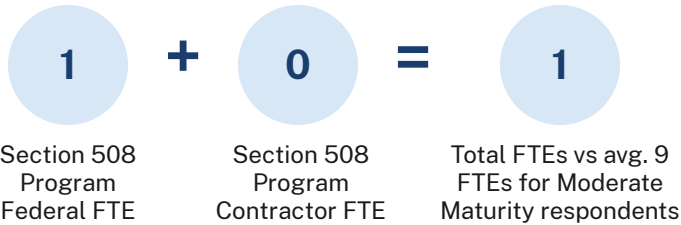
Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**12** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	Moderate	Low
Communications*	Very High	Low
Content Creation	Moderate	Low
Human Capital, Culture, & Leadership	High	Low
Technology Lifecycle Activities**	Low	Low
Testing and Validation	High	Moderate
Acquisition and Procurement	Moderate	Low
Training**	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% - 99%	50% - 90%	50% - 90%	50% - 90%	50% - 90%	50% - 90%	N/A	50% - 90%	Unknown	50% - 90%

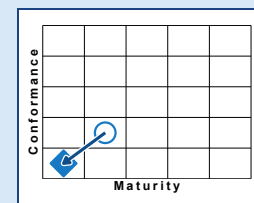
## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	50% fully conform	FY24	0% fully conform	0% fully conform	100% fully conform	Not Applicable
FY23	86% fully conform	94% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Applicable

## Overall Performance

**Maturity: Very Low | Conformance: Very Low****Recommendations for Very Low Maturity, Very Low Conformance:**

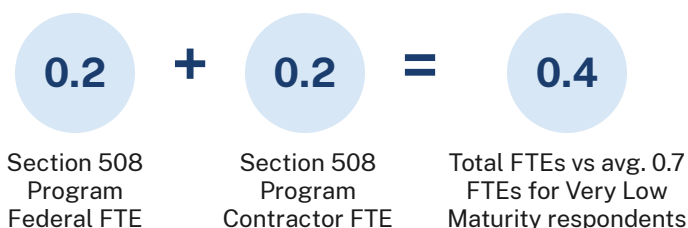
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24    ○ FY23

## Program Highlights

- Q42: Does not know how Section 508 reviews are integrated into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



1

Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Low
Policies, Procedures & Practices	Very Low	Very Low
Communications*	Moderate	Very High
Content Creation**	Very Low	Very Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities**	Very Low	Very High
Testing and Validation**	Very Low	Very Low
Acquisition and Procurement**	Very Low	High
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	90% fully conform	FY23	Not Applicable	Not Tested	Not Tested	Not Tested

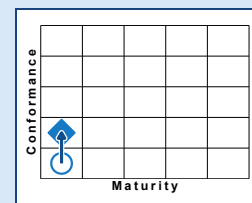
# Marine Mammal Commission

## Overall Performance

**Maturity: Very Low | Conformance: Low**

### Recommendations for Very Low Maturity, Low Conformance:

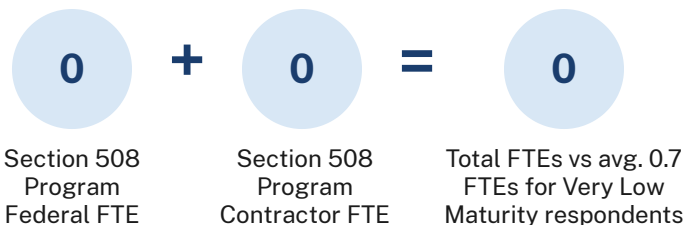
Those in the Very Low-Low overall performance category have several areas where they may invest to improve accessibility. However, as no reporting entity in this category had an established Section 508 program, fully establishing a Section 508 program would likely be a significant first step



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Does not know if Section 508 conformance is integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Very Low
Policies, Procedures & Practices**	Very Low	Very Low
Communications	Low	Low
Content Creation	Very Low	Very Low
Human Capital, Culture, & Leadership*	Low	Very Low
Technology Lifecycle Activities**	Very Low	Very High
Testing and Validation	Very Low	Very Low
Acquisition and Procurement**	Very Low	Very Low
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	N/A	Unknown	N/A	N/A	N/A	N/A	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	Not Tested	FY24	Not Applicable	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Applicable	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-242

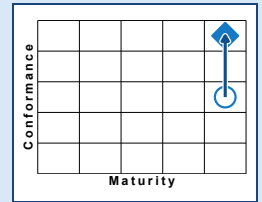
# Merit Systems Protection Board

## Overall Performance

**Maturity: Very High | Conformance: Very High**

### Recommendations for Very High Maturity, Very High Conformance:

Those in the Very High-Very High overall performance category should continue to make incremental improvements particularly in their testing and remediation efforts due to the variability in some of their conformance results.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 35 hours for Very High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very High	Very High
Policies, Procedures & Practices	High	Very High
Communications	Very High	Very High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership**	Moderate	High
Technology Lifecycle Activities*	Very High	Very High
Testing and Validation	Very High	Very High
Acquisition and Procurement*	Very High	Very High
Training	Very High	Very High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	100%	100%	90% -99%	N/A	100%	N/A	100%	100%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	99% fully conform	99% fully conform	FY24	0% fully conform	Not Applicable	100% fully conform	Not Applicable
FY23	90% fully conform	98% fully conform	FY23	0% fully conform	0% fully conform	0%	Not Applicable

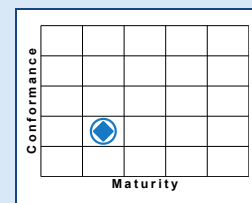
Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-243

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

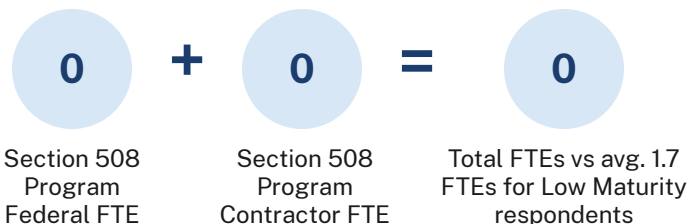
Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**1** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Very Low	Very Low
Policies, Procedures & Practices	Very Low	Moderate
Communications	Very Low	Low
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities	Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement*	High	High
Training	Very Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	90% -99%	90% -99%	100%	90% -99%	90% -99%	90% -99%	100%	90% -99%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	Unknown	FY24	0% fully conform	0% fully conform	0% fully conform	0% fully conform
FY23	0% fully conform	Not Tested	FY23	0% fully conform	80% fully conform	0%	0% fully conform

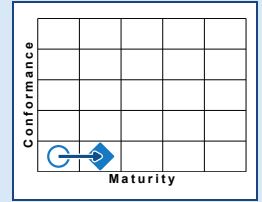


## Overall Performance

**Maturity: Low | Conformance: Very Low**

**Recommendations for Low Maturity, Very Low Conformance:**

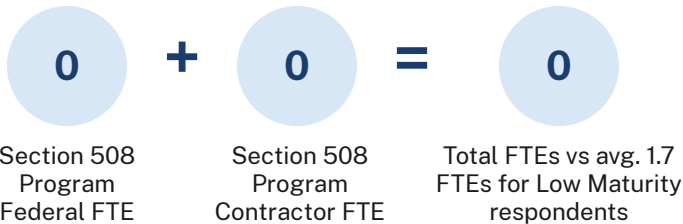
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Never integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Does not have a formal technology development lifecycle



2

Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices**	Very Low	Very Low
Communications*	High	Moderate
Content Creation**	Very Low	Very Low
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation**	Very Low	Very Low
Acquisition and Procurement	Low	Very Low
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	N/A	N/A	Unknown	Unknown	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Not Tested	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-245



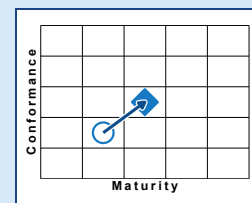
# National Archives and Records Administration

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

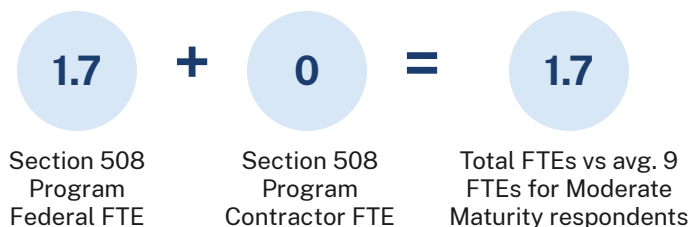
Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**34** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	Moderate	Low
Communications	Moderate	Very Low
Content Creation	Low	Very Low
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities	High	Moderate
Testing and Validation	Low	Low
Acquisition and Procurement*	High	High
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	90% - 99%	90% - 99%	90% - 99%	90% - 99%	N/A	100%	100%	50% - 90%	Unknown

## ICT Testing Outcomes

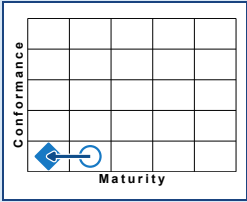
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	9% fully conform	0% fully conform	FY24	80% fully conform	100% fully conform	Not Tested	40% fully conform
FY23	0% fully conform	8% fully conform	FY23	100% fully conform	100% fully conform	100%	Not Tested

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

**Recommendations for Very Low Maturity, Very Low Conformance:**

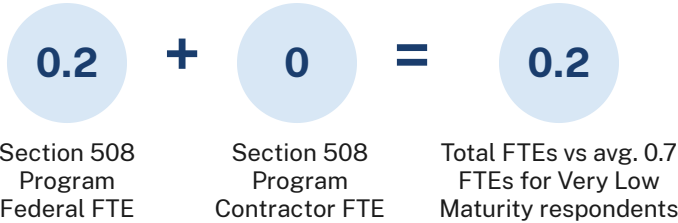
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Very Low	Low
Policies, Procedures & Practices*	Moderate	Moderate
Communications	Low	Very Low
Content Creation	Very Low	Moderate
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Very Low	Low
Testing and Validation	Very Low	Low
Acquisition and Procurement	Very Low	Very Low
Training	Very Low	Very Low

\* Highest in FY24    \*\* Lowest in FY24  
^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	N/A	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

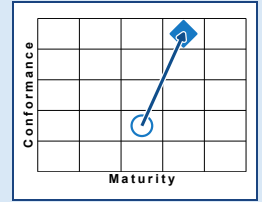


## Overall Performance

**Maturity: High | Conformance: Very High**

### Recommendations for High Maturity, Very High Conformance:

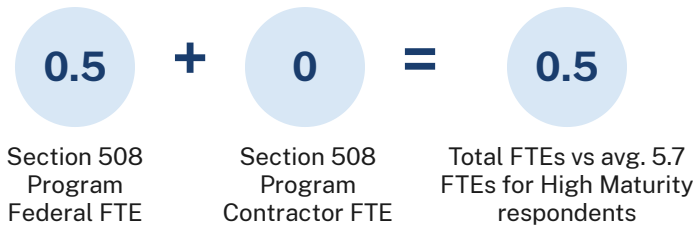
Those in the High-Very High overall performance category should consider a continuing process improvement that includes incremental improvements in the testing efforts and resourcing, while investing more in accessibility communication and Section 508 program efforts.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**8** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Very Low
Policies, Procedures & Practices**	Low	Moderate
Communications	High	High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	Very High	High
Technology Lifecycle Activities	High	High
Testing and Validation	Very High	High
Acquisition and Procurement	Very High	High
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	N/A	N/A	N/A	N/A	Unknown	100%	N/A	100%	N/A

## ICT Testing Outcomes

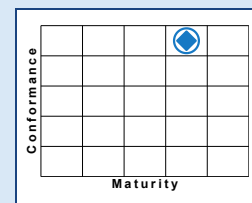
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	99% fully conform	FY24	Not Applicable	100% fully conform	100% fully conform	100% fully conform
FY23	Not Tested	72% fully conform	FY23	Not Tested	Not Tested	100% fully conform	0% fully conform

## Overall Performance

**Maturity: High | Conformance: Very High**

### Recommendations for High Maturity, Very High Conformance:

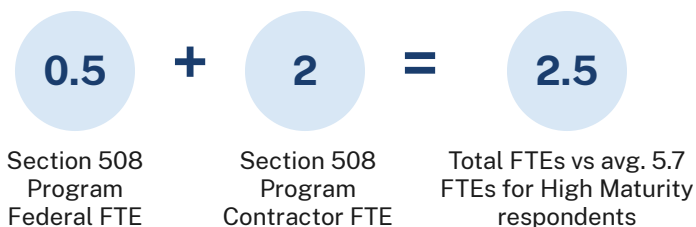
Those in the High-Very High overall performance category should consider a continuing process improvement that includes incremental improvements in the testing efforts and resourcing, while investing more in accessibility communication and Section 508 program efforts.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**20** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	Moderate	High
Communications	High	High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership**	Low	Low
Technology Lifecycle Activities*	Very High	High
Testing and Validation	High	High
Acquisition and Procurement	High	Moderate
Training**	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% - 99%	Unknown	Unknown	90% - 99%	90% - 99%	N/A	N/A	90% - 99%	N/A	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	97% fully conform	98% fully conform	FY24	70% fully conform	100% fully conform	80% fully conform	100% fully conform
FY23	98% fully conform	64% fully conform	FY23	100% fully conform	100% fully conform	70% fully conform	100% fully conform

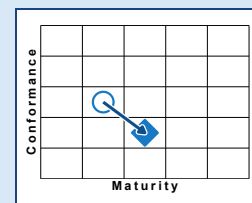
# National Endowment for the Arts

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Does not have a formal technology development lifecycle



**10** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Low
Policies, Procedures & Practices	Moderate	Low
Communications	High	Low
Content Creation**	Low	Low
Human Capital, Culture, & Leadership	Moderate	Low
Technology Lifecycle Activities*	High	Moderate
Testing and Validation**	Low	Moderate
Acquisition and Procurement	Low	Low
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	90% -99%	90% -99%	100%	100%	90% -99%	100%	50% -90%	50% -90%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	Unknown	FY24	Not Tested	0% fully conform	90% fully conform	0% fully conform
FY23	Not Tested	0% fully conform	FY23	Not Tested	0% fully conform	100% fully conform	100% fully conform

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-250

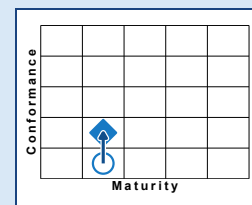
# National Endowment for the Humanities

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

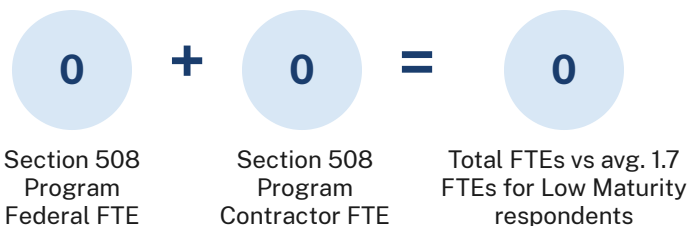
Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Does not have a formal technology development lifecycle



**0** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Low
Policies, Procedures & Practices	Moderate	High
Communications	Very Low	Moderate
Content Creation	Very Low	Moderate
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities*	High	High
Testing and Validation	Very Low	Low
Acquisition and Procurement	Low	Low
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	N/A	100%	N/A	Unknown	N/A	Unknown	100%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	95% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-251



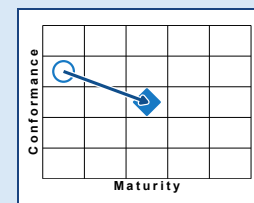
# National Labor Relations Board

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

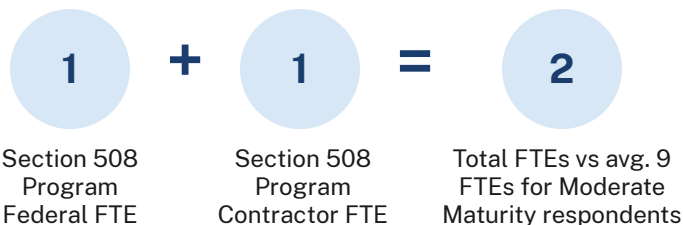
Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**10** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Very Low
Policies, Procedures & Practices	Moderate	Very Low
Communications	Low	Very Low
Content Creation	Low	Very Low
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities**	Very Low	Very Low
Testing and Validation	Moderate	Very Low
Acquisition and Procurement	Moderate	Low
Training*	High	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	50%-90%	100%	90%-99%	100%	90%-99%	50%-90%	50%-90%	100%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	0% fully conform	FY24	Not Tested	100% fully conform	100% fully conform	Not Tested
FY23	Not Tested	Not Tested	FY23	100% fully conform	100% fully conform	100% fully conform	100% fully conform



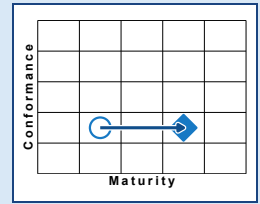
# National Mediation Board

## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

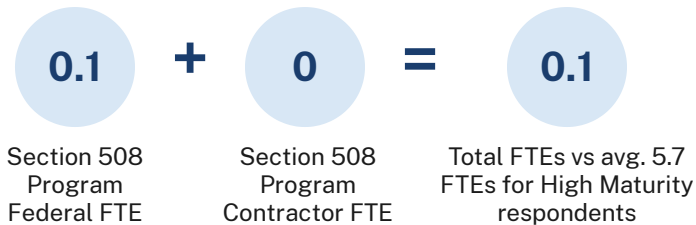
Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**0.5** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Very Low
Policies, Procedures & Practices	Very High	Low
Communications	Very High	Low
Content Creation	Very High	Moderate
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Very High	Very High
Testing and Validation	Very High	Moderate
Acquisition and Procurement*	Very High	Moderate
Training	High	Very Low

\* Highest in FY24 \*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	100%	100%	100%	100%	100%	N/A	100%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	70% fully conform	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	10% fully conform	FY23	Not Applicable	Not Tested	Not Tested	Not Tested

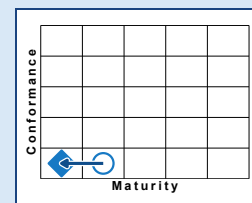
# National Transportation Safety Board

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

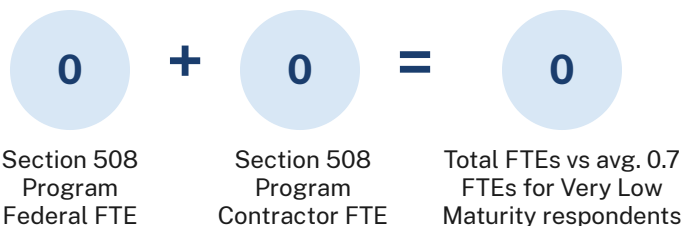
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**20** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	Unknown	Unknown	90%-99%	Unknown	Unknown	90%-99%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Unknown	FY24	Not Tested	10% fully conform	20% fully conform	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-254



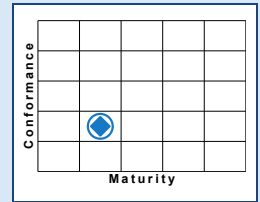
# Nuclear Waste Technical Review Board

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

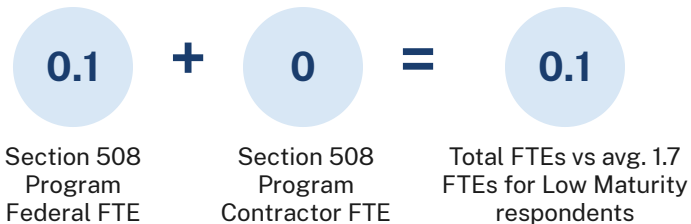
Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**0.75** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	N/A	100%	N/A	N/A	N/A	Unknown	<50%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	Not Tested	FY24	Not Applicable	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Applicable	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-255

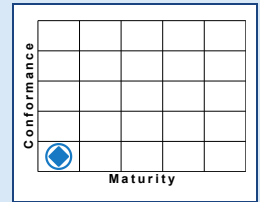
# Occupational Safety and Health Review Commission

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

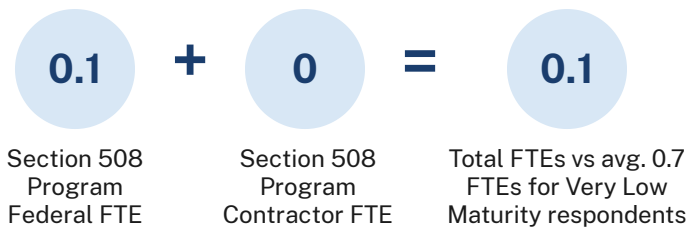
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is never integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Very Low
Policies, Procedures & Practices	Very Low	Low
Communications**	Very Low	Very Low
Content Creation	Low	Very Low
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Very Low	Very Low
Testing and Validation*	Low	Low
Acquisition and Procurement	Very Low	Very Low
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	N/A	Unknown	Unknown	N/A

## ICT Testing Outcomes

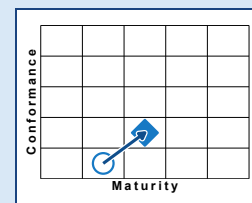
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Applicable
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

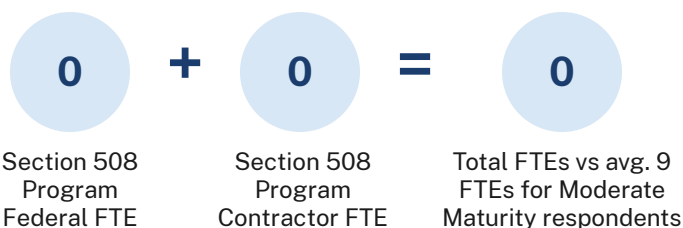
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**2** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Very Low
Policies, Procedures & Practices	High	Very Low
Communications	High	Very Low
Content Creation	Moderate	Low
Human Capital, Culture, & Leadership	Moderate	Low
Technology Lifecycle Activities	Low	Moderate
Testing and Validation**	Low	Low
Acquisition and Procurement	Low	High
Training*	High	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	100%	N/A	N/A	90% -99%	100%	90% -99%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	76% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-257



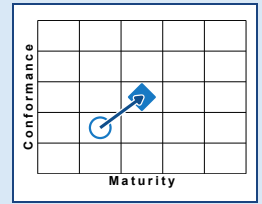
# Office of Navajo and Hopi Indian Relocation

## Overall Performance

**Maturity: Moderate | Conformance: Moderate**

### Recommendations for Moderate Maturity, Moderate Conformance:

Those in the Moderate-Moderate overall performance category should increase the frequency or depth of consideration of accessibility in the technology development lifecycle and create repeatable remediation processes. While a majority had resources to test their ICT, a relatively low percentage of entities showed full conformance to standards.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**4** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Low	Low
Policies, Procedures & Practices**	Low	Low
Communications*	Very High	Low
Content Creation	High	Very Low
Human Capital, Culture, & Leadership**	Low	Low
Technology Lifecycle Activities**	Low	Very High
Testing and Validation	Low	Very Low
Acquisition and Procurement	Moderate	Moderate
Training	High	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	N/A	N/A	N/A	N/A	<50%	Unknown	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	0% fully conform	FY24	Not Applicable	Not Tested	Not Tested	Not Applicable
FY23	Not Tested	Not Tested	FY23	Not Applicable	Not Tested	Not Tested	Not Applicable

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-258

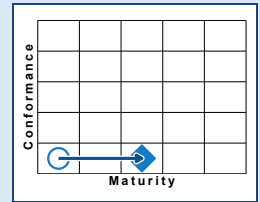


## Overall Performance

**Maturity: Moderate | Conformance: Very Low**

### Recommendations for Moderate Maturity, Very Low Conformance:

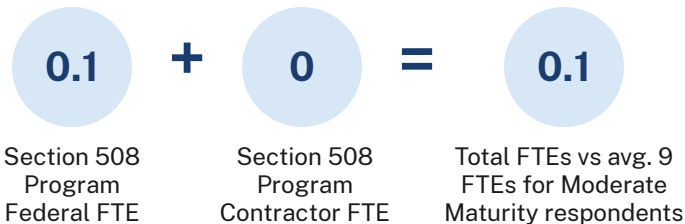
Those in the Moderate-Very Low overall performance category should continue to invest resources in testing and developing testing capabilities.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**4** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Very Low
Policies, Procedures & Practices	High	Very Low
Communications	Low	Low
Content Creation	Low	Very Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities*	Very High	Low
Testing and Validation	Low	Very Low
Acquisition and Procurement*	Very High	Moderate
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	100%	100%	100%	100%	N/A	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	0% fully conform	FY24	Not Tested	0% fully conform	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-259

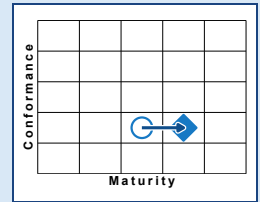


## Overall Performance

**Maturity: High | Conformance: Low**

### Recommendations for High Maturity, Low Conformance:

Given high maturity outcomes and a many responses stating that entities do not have resources to test for conformance, those in the High-Low overall performance category should consider dedicating significant resources to developing testing and remediation processes and capabilities to improve conformance outcomes.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 5.7  
FTEs for High Maturity  
respondents

2

Hours per week spent by 508 PM vs avg. 23  
hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices	Moderate	Moderate
Communications	Very High	Low
Content Creation	Low	Low
Human Capital, Culture, & Leadership	Low	Moderate
Technology Lifecycle Activities	Very High	Moderate
Testing and Validation	High	Low
Acquisition and Procurement*	Very High	Moderate
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	100%	90% - 99%	90% - 99%	90% - 99%	100%	100%	90% - 99%	90% - 99%	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	0% fully conform	50% fully conform	FY23	10% fully conform	0% fully conform	10% fully conform	0% fully conform

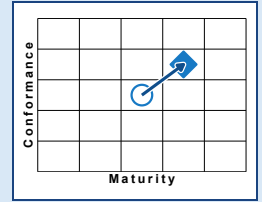
# Pension Benefit Guaranty Corporation

## Overall Performance

**Maturity: High | Conformance: High**

**Recommendations for High Maturity, High Conformance:**

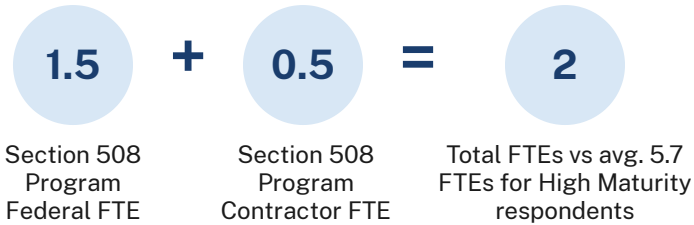
Those in the High-High overall performance category should consider a balanced approach to improving maturity, particularly around prioritizing risk in the technology development lifecycle.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program*	High	High
Policies, Procedures & Practices	High	Moderate
Communications	High	Low
Content Creation**	Low	Very Low
Human Capital, Culture, & Leadership*	High	Moderate
Technology Lifecycle Activities	Moderate	Moderate
Testing and Validation	High	Low
Acquisition and Procurement	Moderate	Low
Training	Moderate	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	100%	100%	90% -99%	90% -99%	100%	90% -99%	100%	N/A	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	93% fully conform	FY24	Not Tested	80% fully conform	33.3% fully conform	Not Applicable
FY23	Not Tested	1% fully conform	FY23	Not Tested	Not Tested	100% fully conform	100% fully conform

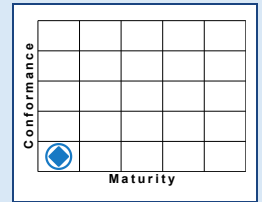


## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

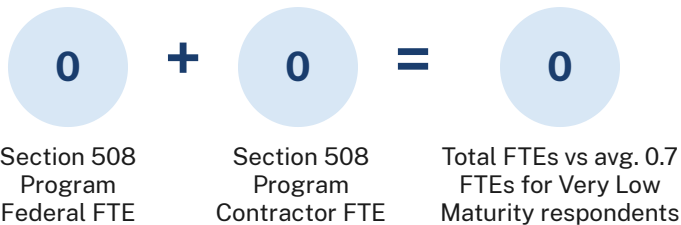
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Never integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is never integrated throughout technology development lifecycle activities.



0 Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program***	Very Low	Very Low
Policies, Procedures & Practices	Very Low	Very Low
Communications	Very Low	Very Low
Content Creation	Very Low	Very Low
Human Capital, Culture, & Leadership	Very Low	Very Low
Technology Lifecycle Activities	Very Low	Very Low
Testing and Validation	Very Low	Very Low
Acquisition and Procurement	Very Low	Low
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	Unknown	Unknown	Unknown	N/A	N/A	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

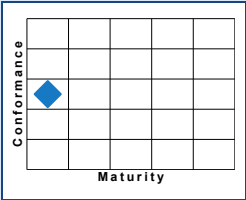
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Not Tested	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

## Overall Performance

**Maturity: Very Low | Conformance: Moderate**

**Recommendations for Very Low Maturity, Moderate Conformance:**

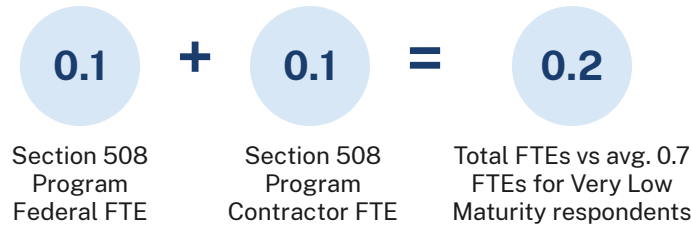
Those in the Very Low-Moderate overall performance category should invest in establishing a Section 508 Program Office at the entity, as well as establishing a baseline for those activities that are currently not being performed –specifically accessibility-related activities aligned to Training, Communications and Policies, Procedures, and Practices.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Does not have a formal technology development lifecycle



**0** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	No Data
Policies, Procedures & Practices**	Very Low	No Data
Communications**	Very Low	No Data
Content Creation	Very Low	No Data
Human Capital, Culture, & Leadership	Very Low	No Data
Technology Lifecycle Activities	Low	No Data
Testing and Validation	Very Low	No Data
Acquisition and Procurement*	High	No Data
Training**	Very Low	No Data

\* Highest in FY24    \*\* Lowest in FY24  
^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	N/A	N/A	Unknown	90% - 99%	Unknown	Unknown	Unknown	50% - 90%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	100% fully conform	FY24	Not Tested	50% fully conform	0% fully conform	100% fully conform
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data



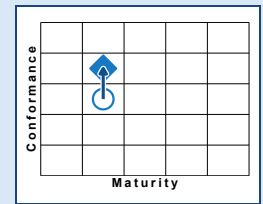
# Privacy and Civil Liberties Oversight Board

## Overall Performance

**Maturity: Low | Conformance: High**

### Recommendations for Low Maturity, High Conformance:

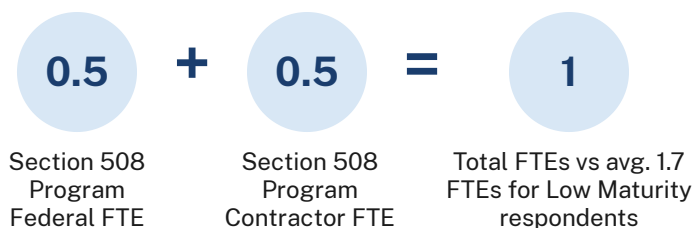
Those in the Low-High category should invest in improving tracking and remediation of nonconformant content across the enterprise as well as include digital accessibility in Human Capital, Culture, and Leadership efforts, particularly including ICT accessibility into DEIA and mission-related strategic efforts.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**1** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Low
Policies, Procedures & Practices	Moderate	Very Low
Communications**	Very Low	Low
Content Creation	Low	Very Low
Human Capital, Culture, & Leadership	Low	Very Low
Technology Lifecycle Activities	Low	Moderate
Testing and Validation*	Moderate	Low
Acquisition and Procurement	Low	High
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	Unknown	Unknown	100%	N/A	N/A	100%	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	75% fully conform	FY24	Not Applicable	100% fully conform	Not Tested	Not Applicable
FY23	Not Tested	99% fully conform	FY23	Not Applicable	0% fully conform	0% fully conform	Not Applicable

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-264

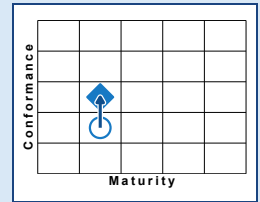
# Railroad Retirement Board

## Overall Performance

**Maturity: Low | Conformance: Moderate**

### Recommendations for Low Maturity, Moderate Conformance:

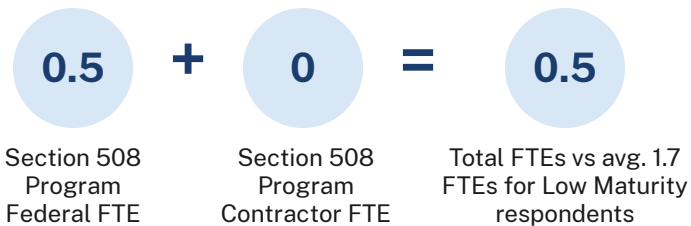
Those in the Low-Moderate overall performance category should continue to invest in establishing processes for creating accessible communications as well as addressing accessibility in acquisition within the entity.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in some ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**0.1** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Very Low	Low
Policies, Procedures & Practices	Low	Moderate
Communications**	Very Low	Low
Content Creation*	Moderate	Very Low
Human Capital, Culture, & Leadership	Moderate	Very Low
Technology Lifecycle Activities	Very Low	Low
Testing and Validation	Moderate	Very Low
Acquisition and Procurement	Low	Very Low
Training	Moderate	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	100%	Unknown	100%	Unknown	100%	100%	N/A	100%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Unknown	FY24	Not Tested	100% fully conform	Not Tested	Not Applicable
FY23	Not Tested	Not Tested	FY23	Not Tested	10% fully conform	Not Tested	Not Applicable

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-265



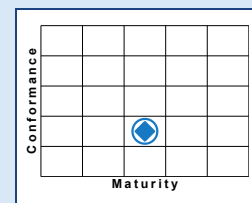
# Securities and Exchange Commission

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

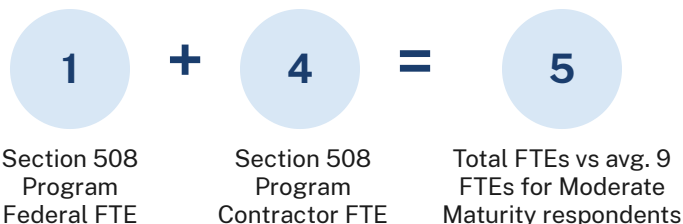
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is regularly integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	High
Policies, Procedures & Practices	High	High
Communications	High	High
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities*	High	High
Testing and Validation	Low	Low
Acquisition and Procurement	Moderate	Low
Training**	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	90% - 99%	50% - 90%	50% - 90%	<50%	90% - 99%	50% - 90%	90% - 99%	90% - 99%	50% - 90%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	48% fully conform	36% fully conform	FY24	100% fully conform	10% fully conform	0% fully conform	0% fully conform
FY23	37% fully conform	10% fully conform	FY23	0% fully conform	0% fully conform	0% fully conform	0% fully conform



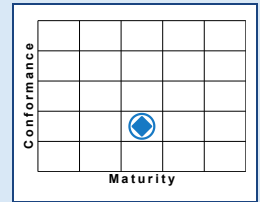
# Selective Service System

## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

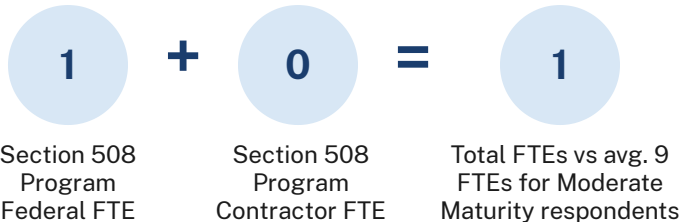
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**10** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	Moderate	Moderate
Communications	Very High	Very High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	Moderate	Moderate
Technology Lifecycle Activities**	Very Low	Very Low
Testing and Validation	Moderate	Moderate
Acquisition and Procurement	Moderate	Moderate
Training	Low	Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	N/A	N/A	90% - 99%	90% - 99%	90% - 99%	90% - 99%	90% - 99%	N/A	90% - 99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Unknown	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	Not Tested	Not Tested	FY23	Not Tested	Not Tested	Not Tested	Not Tested

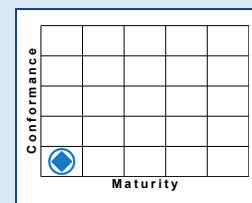
Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-267

## Overall Performance

**Maturity: Very Low | Conformance: Very Low**

### Recommendations for Very Low Maturity, Very Low Conformance:

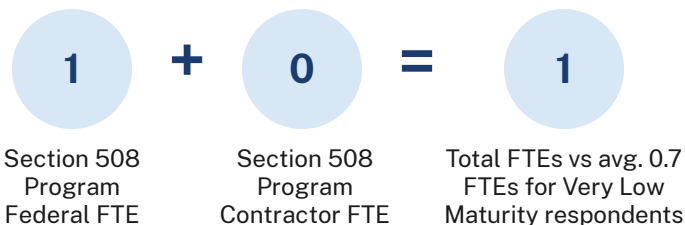
Those in the Very Low-Very Low overall performance category have several areas where they may invest. However, given the low response rate for testing of ICT to ensure adherence to Section 508 standards, a first suggestion would be to expand accessibility testing practices and increase resourcing for testing of ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Sometimes integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is never integrated throughout technology development lifecycle activities.



**0** Hours per week spent by 508 PM vs avg. 4.5 hours for Very Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program**	Very Low	Very Low
Policies, Procedures & Practices*	Low	Very Low
Communications**	Very Low	Very Low
Content Creation	Very Low	Very Low
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities**	Very Low	Very Low
Testing and Validation	Very Low	Very Low
Acquisition and Procurement**	Very Low	Low
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

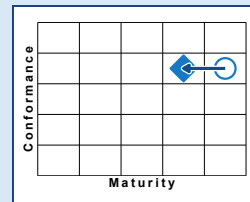
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	0% fully conform	FY24	0% fully conform	0% fully conform	Not Tested	0% fully conform
FY23	0% fully conform	0% fully conform	FY23	0% fully conform	0% fully conform	Not Applicable	0% fully conform

## Overall Performance

**Maturity: High | Conformance: High**

### Recommendations for High Maturity, High Conformance:

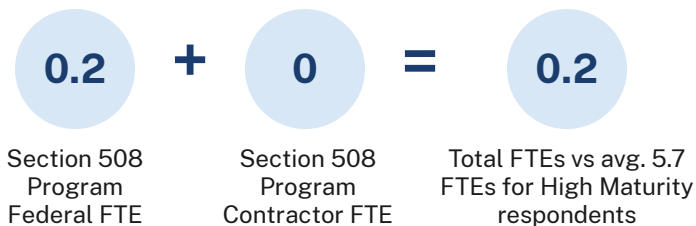
Those in the High-High overall performance category should consider a balanced approach to improving maturity, particularly around prioritizing risk in the technology development lifecycle.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans but has plans to do so.
- Q50: Section 508 conformance is frequently integrated throughout technology development lifecycle activities.



**0.2** Hours per week spent by 508 PM vs avg. 23 hours for High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Very High
Policies, Procedures & Practices	Moderate	High
Communications	Very High	Very High
Content Creation*	Very High	Very High
Human Capital, Culture, & Leadership	High	Very High
Technology Lifecycle Activities	High	Very High
Testing and Validation	High	Very High
Acquisition and Procurement	High	High
Training**	Moderate	High

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50%-90%	N/A	N/A	50%-90%	N/A	100%	50%-90%	100%	100%	50%-90%

## ICT Testing Outcomes

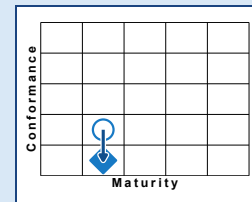
All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	99% fully conform	FY24	0% fully conform	100% fully conform	60% fully conform	100% fully conform
FY23	0% fully conform	99% fully conform	FY23	0% fully conform	90% fully conform	60% fully conform	100% fully conform

## Overall Performance

**Maturity: Low | Conformance: Very Low**

### Recommendations for Low Maturity, Very Low Conformance:

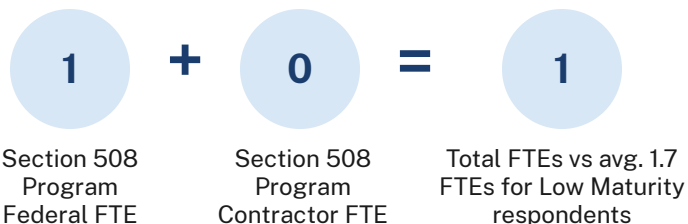
Those in the Low-Very Low overall performance category should continue to invest in establishing a Section 508 Program Office at the entity, as well as investing in their testing activities including allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Frequently integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**5** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Low	Low
Policies, Procedures & Practices	Low	Low
Communications	Low	Low
Content Creation*	Moderate	Low
Human Capital, Culture, & Leadership	Low	Low
Technology Lifecycle Activities	Low	Low
Testing and Validation	Low	Low
Acquisition and Procurement	Low	Low
Training**	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% -90%	50% -90%	50% -90%	50% -90%	Unknown	90% -99%	Unknown	Unknown	Unknown	Unknown

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	60% fully conform	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	60% fully conform	1% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

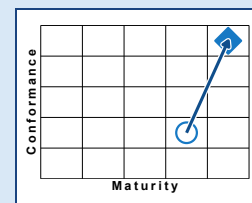
# U.S. Commission on Civil Rights

## Overall Performance

**Maturity: Very High | Conformance: Very High**

### Recommendations for Very High Maturity, Very High Conformance:

Those in the Very High-Very High overall performance category should continue to make incremental improvements particularly in their testing and remediation efforts due to the variability in some of their conformance results.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in a majority of ICT leadership and management performance plans
- Q50: Section 508 conformance is almost always integrated throughout technology development lifecycle activities.

2.5

+

0

=

2.5

Section 508  
Program  
Federal FTE

Section 508  
Program  
Contractor FTE

Total FTEs vs avg. 12.3  
FTEs for Very High  
Maturity respondents

10

Hours per week spent by 508 PM vs avg. 35  
hours for Very High Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	Moderate
Policies, Procedures & Practices**	Moderate	Moderate
Communications	Very High	High
Content Creation*	Very High	High
Human Capital, Culture, & Leadership	Very High	Very High
Technology Lifecycle Activities	Very High	Very High
Testing and Validation*	Very High	High
Acquisition and Procurement	Very High	High
Training	Moderate	Moderate

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
90% -99%	90% -99%	50% -90%	N/A	90% -99%	90% -99%	90% -99%	90% -99%	90% -99%	90% -99%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	N/A	92% fully conform	FY24	Not Applicable	100% fully conform	80% fully conform	100% fully conform
FY23	Not Tested	85% fully conform	FY23	Not Tested	Not Tested	Not Tested	Not Tested

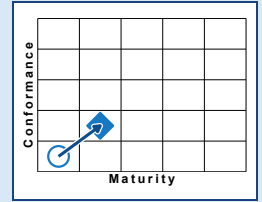
# U.S. International Development Finance Corporation

## Overall Performance

**Maturity: Low | Conformance: Low**

### Recommendations for Low Maturity, Low Conformance:

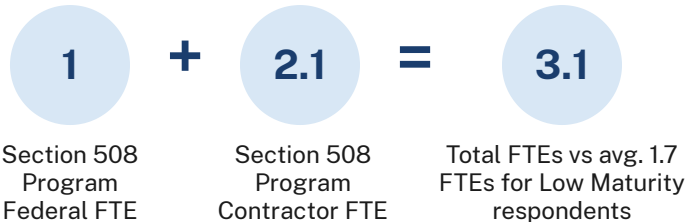
Those in the Low-Low overall performance category should continue to invest in establishing Training activities as well as investing in their testing activities, particularly allocating resources to testing their top-viewed ICT.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not include Section 508 compliance is included in ICT-related leadership and management performance plans and has no plans to do so.
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 11.5 hours for Low Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	Moderate	Very Low
Policies, Procedures & Practices	Moderate	Very Low
Communications	Moderate	Very Low
Content Creation*	High	Very Low
Human Capital, Culture, & Leadership**	Very Low	Low
Technology Lifecycle Activities	Low	Very Low
Testing and Validation	Low	Very Low
Acquisition and Procurement	Low	Very Low
Training	Very Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
50% - 90%	90% - 99%	90% - 99%	50% - 90%	90% - 99%	100%	50% - 90%	90% - 99%	90% - 99%	N/A

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	0% fully conform	FY24	0% fully conform	0% fully conform	10% fully conform	0% fully conform
FY23	Not Tested	Not Tested	FY23	0% fully conform	0% fully conform	Not Tested	0% fully conform

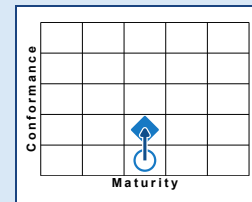


## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Regularly integrates Section 508 reviews into electronic content prior to publication.
- Q44: Does not know if Section 508 compliance is included in ICT-related leadership and management performance plans
- Q50: Section 508 conformance is sometimes integrated throughout technology development lifecycle activities.



**40** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	High
Policies, Procedures & Practices	High	High
Communications*	Very High	High
Content Creation	Low	Moderate
Human Capital, Culture, & Leadership**	Very Low	Very Low
Technology Lifecycle Activities	Low	Very Low
Testing and Validation	Low	Low
Acquisition and Procurement	Moderate	Moderate
Training	Low	Very Low

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
N/A	50%-90%	Unknown	100%	<50%	50%-90%	90%-99%	50%-90%	N/A	<50%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	0% fully conform	0% fully conform	FY24	0% fully conform	0% fully conform	100% fully conform	0% fully conform
FY23	0% fully conform	0% fully conform	FY23	0% fully conform	0% fully conform	0% fully conform	0% fully conform

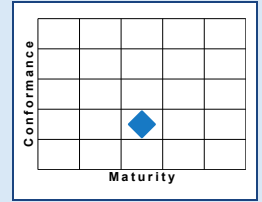


## Overall Performance

**Maturity: Moderate | Conformance: Low**

### Recommendations for Moderate Maturity, Low Conformance:

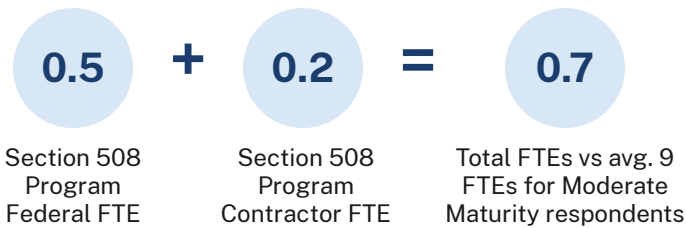
Those in the Moderate-Low overall performance category should continue to invest resources in expanding testing capabilities, particularly including those with disabilities in testing public content.



◆ FY24 ○ FY23

## Program Highlights

- Q42: Almost always integrates Section 508 reviews into electronic content prior to publication.
- Q44: Includes Section 508 compliance in all or almost all ICT leadership and management performance plans
- Q50: Does not have a formal technology development lifecycle



**1** Hours per week spent by 508 PM vs avg. 20.5 hours for Moderate Maturity respondents

## Maturity Outcomes

Dimensions	FY24 Maturity	FY23 Maturity
IT Accessibility Program	High	No Data
Policies, Procedures & Practices	Moderate	No Data
Communications	Very Low	No Data
Content Creation*	Very High	No Data
Human Capital, Culture, & Leadership	Moderate	No Data
Technology Lifecycle Activities	Very High	No Data
Testing and Validation	Moderate	No Data
Acquisition and Procurement	Very High	No Data
Training**	Very Low	No Data

\* Highest in FY24

\*\* Lowest in FY24

^ does not perform dimension function

## How Conformant is ICT?

Res. System	Survey Tool	Surveys	Chat	LMS	ICT Policy	Video Player	Fillable Form	FY25 CJ	Performance Portal
100%	N/A	N/A	100%	100%	100%	100%	N/A	100%	100%

## ICT Testing Outcomes

All Web Pages	Internal Intranet	Public Internet	Top Viewed ICT	Internal Intranet	Public Internet	Public Electronic Documents	Public Videos
FY24	Not Tested	Unknown	FY24	Not Tested	Not Tested	Not Tested	Not Tested
FY23	No Data	No Data	FY23	No Data	No Data	No Data	No Data

Please refer to the first page of Appendix C: Overview Data By Reporting Entity for further explanation of this data. FY24 | C-274



## **Appendix D: U.S. Department of Justice Addendum Submission to Congress and the President Concerning Federal Agencies' Compliance with Section 508 of the Rehabilitation Act Accessibility of Federal Electronic and Information Technology**

Section 508 of the Rehabilitation Act requires federal agencies to ensure that their information and communication technology (ICT) is accessible to people with disabilities, unless certain exceptions apply. The statute requires federal agencies to ensure that ICT they develop, procure, maintain, or use allows employees with disabilities and individuals with disabilities who are members of the public to have access to and use of information and data. This access should be comparable to that available to employees and members of the public without disabilities.

Section 508 requires the Attorney General to submit to the President and Congress biennial reports containing information on and recommendations regarding the state of federal department and agency compliance with Section 508.<sup>1</sup> The last such report was submitted jointly with the General Services Administration (GSA) in 2023.<sup>2</sup>

Section 752 of the Consolidated Appropriations Act of 2023 required GSA to submit to Congress an annual assessment of federal agencies' compliance with criteria that GSA sets for conformance with Section 508, along with recommendations for Congress and federal agencies to support compliance with those criteria.<sup>3</sup> This obligation substantially overlaps with the Justice Department's obligation to submit a biennial report concerning compliance with Section 508.

Accordingly, the Department collaborated with GSA to ensure that the data collection and analysis highlighted in GSA's report included information necessary for the Department's biennial reporting obligation under Section 508. The Department submits the information in this report in satisfaction of the obligation in 29 U.S.C. § 794d(d)(2).

---

<sup>1</sup>29 U.S.C. § 794d(d)(2).

<sup>2</sup> Department of Justice and General Services Administration, Section 508 Report to Congress and the President, Accessibility of Federal Electronic and Information Technology (Jan. 2023), <https://www.justice.gov/crt/page/file/1569331/dl?inline>.

<sup>3</sup> 29 U.S.C. § 794d-1.

