



EXECUTIVE OFFICE OF THE PRESIDENT  
OFFICE OF MANAGEMENT AND BUDGET  
WASHINGTON, D.C. 20503

THE DIRECTOR

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M-24-08

MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

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SUBJECT: Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act

**I. INTRODUCTION**

This memorandum provides guidance to help agencies advance digital accessibility by maintaining an accessible Federal technology environment, promoting accessible digital experiences, and continuing the implementation of accessibility standards in accordance with Section 508 of the Rehabilitation Act of 1973, as amended (Section 508).<sup>1</sup> This memorandum rescinds the following memoranda from the Office of Management and Budget (OMB): *Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act* (Jan. 24, 2013), *Improving the Accessibility of Government Information* (July 19, 2010), *Ensuring the Accessibility of Federal Electronic and Information Technologies Procured by Federal Agencies* (Nov. 6, 2007), and *Buying Accessible Electronic and Information Technology and Complying with Section 508 of the Rehabilitation Act* (Aug. 11, 2005).<sup>2</sup>

Members of the public and Federal employees should have equitable access to government, regardless of ability. The prevalence of information technology and the growing necessity of it in daily life make digital accessibility a continuing imperative for Federal agencies. As used in this memorandum, “digital accessibility” refers to those practices related to the development, procurement, maintenance, and use of information and communication technology that ensure functionality is accessible to and usable by individuals with disabilities as provided by law, either directly or by supporting the use of a person’s assistive technology. This memorandum provides requirements and recommendations to support agency integration of digital accessibility into their missions and operations, with the end goal of helping government technology and information resources better serve a diverse public and Federal workforce.

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<sup>1</sup> 29 U.S.C. § 794d.

<sup>2</sup> All four OMB memoranda are available at [https://obamawhitehouse.archives.gov/omb/procurement\\_index\\_508/](https://obamawhitehouse.archives.gov/omb/procurement_index_508/)

## II. SCOPE AND APPLICABILITY

This memorandum applies to all agencies, as defined in 44 U.S.C. § 3502, that are subject to the requirements of Section 508 and to those agencies' development, procurement, maintenance, and use of electronic and information technology, also known as "information and communication technology (ICT)" under the technical standards issued pursuant to Section 508 by the Architectural and Transportation Barriers Compliance Board ("Access Board").<sup>3</sup>

This memorandum does not apply to national security systems.<sup>4</sup> However, agencies are encouraged to implement this guidance in managing national security systems, where feasible.

## III. BUILDING AND SUSTAINING ACCESSIBLE FEDERAL TECHNOLOGY

Building and sustaining an accessible Federal technology environment is an operational imperative given that 25 percent (61 million) of adults in the United States have a disability.<sup>5</sup> Within the Federal workforce, 17 percent of employees surveyed in 2022 identified as having a disability.<sup>6</sup> The actual numbers may even be larger than reported because of evolving concepts and perceptions of disability.<sup>7</sup>

A large number of people (for example, spouses, partners, family members, friends, neighbors, and professionals) also provide support to individuals with disabilities. In the United States, an estimated 40 million people are caregivers who provide support to a person with a disability.<sup>8</sup> Accessible ICT gives people with disabilities more independence and can reduce the need for assistance from others. The Federal Government cannot fulfill its obligations and effectively provide services to the public without responding to the needs of such a large segment of the population.

Accessibility is a strategic investment. In addition to being an operational imperative, an organizational commitment to accessibility itself provides numerous benefits:

- Accessibility is an essential part of Federal Government modernization that utilizes digital technologies to effectively serve the public as well as the employees who need tools to do their jobs effectively. Continuous accessibility improvements lead to better, higher-quality software and employee engagement, which can improve agency operations and reduce long-term operating costs.

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<sup>3</sup> See 36 C.F.R. part 1194, app. A (E103.4). The Access Board defines ICT as "information 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."

<sup>4</sup> As used in this memorandum, the term "national security system" has the meaning given in 40 U.S.C. § 11103.

<sup>5</sup> See National Center on Birth Defects and Developmental Disabilities, Centers for Disease Control and Prevention, Disability and Health Data System (DHDS) Data, <https://dhds.cdc.gov>

<sup>6</sup> See OPM Federal Employee Viewpoint Survey Results 2022 Governmentwide Management Report, <https://www.opm.gov/fevs/reports/governmentwide-reports/governmentwide-reports/governmentwide-management-report/2022/2022-governmentwide-management-report.pdf>

<sup>7</sup> See About Disability, U.S. Census Bureau, <https://www.census.gov/topics/health/disability/about.html>

<sup>8</sup> See AARP and National Alliance for Caregiving, *Caregiving in the United States 2020*.

- Accessibility is critical to improving Federal customer experience and building public trust in government. Websites, web applications, mobile applications, and digital services that inadvertently create barriers for people with disabilities may degrade the public’s experience. Ensuring digital accessibility of government information and services helps ensure users of diverse abilities can use digital tools to interact with government.<sup>9</sup>
- Accessibility is essential for supporting a Federal workplace culture that is inclusive and fosters a sense of belonging for all employees, including those with disabilities. Accessible ICT fuels productivity, leads to improved and expanded recruitment, boosts employee retention, and supports workplace diversity.

This memorandum outlines the areas on which agencies must focus in order to build and sustain an accessible Federal technology environment.

## **A. Establish Digital Accessibility Programs and Policies**

Establishing clear roles, responsibilities, and organizational capacity and processes facilitate agencies’ oversight and prioritization of the technological, financial, and human resources needed to promote and ensure Section 508 compliance and digital accessibility.<sup>10</sup> This includes dedicating sufficient resources for accessibility programs to be effective; developing and maintaining policies and procedures; and creating a dedicated, well trained workforce to drive digital accessibility efforts and ensure conformance.

- The agency Chief Information Officer (CIO) (or designee) provides leadership and direction for the agency’s Section 508 program.
- Agencies shall establish an agency-wide Section 508 program with appropriate resources (e.g., staff, technology, tools) and appoint a Section 508 program manager to serve as the agency’s principal point of contact on Section 508 and the accessibility of ICT.<sup>11</sup>
- Each agency CIO (or designee) and Section 508 program manager should coordinate with the agency’s Chief Acquisition Officer, Chief Diversity and Inclusion Officer,<sup>12</sup> Chief Human Capital Officer, Equal Employment Opportunity Officer, General Counsel, and other relevant agency officials, digital services teams, and program staff to ensure implementation of Section 508 and to better support agency-wide accessibility efforts.
- Agencies should ensure Section 508 program managers possess the necessary knowledge, skills, experience, and authority to implement agency-wide digital accessibility policies

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<sup>9</sup> See OMB Memorandum M-23-22, *Delivering a Digital-First Public Experience*.

<sup>10</sup> This memorandum establishes policies for the management of ICT that will facilitate agencies’ digital accessibility efforts, including implementation of Section 508. It does not, however, alter agencies’ legal obligations under Section 508 itself.

<sup>11</sup> At the discretion of the agency CIO (or designee), sub-agencies, components, and offices may maintain a sub-agency-, component-, or office-specific Section 508 program; however, all Section 508 programs must coordinate with the agency-wide Section 508 program, including the centralization of reporting requirements.

<sup>12</sup> See Executive Order 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*.

and to monitor, assess, and provide technical assistance to the agency regarding Section 508 and ICT accessibility.<sup>13</sup>

- Agencies should establish agency-wide policies and procedures to manage the accessibility of ICT. This includes, at a minimum, establishing:
  - Clear authorities, roles and responsibilities, and expectations<sup>14</sup> for how Section 508 compliance is addressed in technology acquisition, development, configuration, deployment, and maintenance activities;
  - Documented processes and procedures for Section 508 conformance testing; and
  - Documented processes and procedures for how Section 508 issues and complaints are reported, assessed, tracked, and resolved.
- Agencies shall maintain a digital accessibility statement on Federal websites<sup>15</sup> that provides or links to the following information:
  - The accessibility standard applied to the website and any known limitations or alternative versions, as appropriate;
  - The contact information for the Section 508 program manager (name and email address);
  - A public feedback mechanism that allows members of the public to report accessibility problems with agency websites and digital services to the agency's Section 508 program as well as relevant implementation teams;<sup>16</sup>
  - Instructions for filing a complaint alleging a violation of Section 508;
  - Information about the agency's reasonable accommodations procedures for Federal employees and job applicants, consistent with Section 501 of the Rehabilitation Act;
  - Instructions on the use of the telecommunications relay service;<sup>17</sup>
  - Links to any relevant, publicly available organizational policies or procedures on digital accessibility; and
  - Date that the digital accessibility statement was last updated or reviewed.

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<sup>13</sup> See Appendix A (Agency Section 508 program manager).

<sup>14</sup> See more about roles and responsibilities in Appendix A: Agency Roles and Responsibilities Related to Section 508, and Appendix B: Government-wide Roles and Responsibilities Related to Section 508.

<sup>15</sup> Agencies should develop this statement and its display in coordination with requirements in OMB Memorandum M-23-22. Agencies are free to display this information in a manner that works best for the agency (e.g., a link in the footer of the site). Agencies may develop a single accessibility statement for the entire organization (and all websites) and link to that accessibility statement or agencies may develop many tailored accessibility statements for different sub-agencies, components, and offices or products.

<sup>16</sup> Agencies may use a web-based form or a general inbox managed by the Section 508 program as a feedback mechanism, but the web-based form must comply with Section 508 standards.

<sup>17</sup> See 40 U.S.C. § 18102

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

## **B. Buy Accessible Products and Services**

The Federal Government is the world’s largest customer and buys a wide range of products and services. When procuring technology, agencies must account for their obligation under Section 508 to ensure that, absent an applicable exception, agency ICT meets the technical standards set by the Access Board.

To procure accessible ICT, buyers and suppliers need to understand Section 508 standards and their associated obligations. Buyers need to appropriately articulate requirements for digital accessibility and obtain suitable evidence that the supplier understands and is capable of meeting those requirements.

Accordingly, Federal Acquisition Regulation (FAR) sections 11.002(f) and 39.203 require agencies to ensure that Section 508 standards are incorporated into the acquisition lifecycle. This includes acquisition planning, market research, solicitations, evaluations, and contract management, as appropriate.<sup>18</sup>

In addition, agencies are encouraged to consider adoption of the following practices when developing and managing procurement processes:

- Include Section 508 program managers or other digital accessibility subject matter experts as key stakeholders throughout the acquisition lifecycle.
- Use the Accessibility Requirements Tool (ART) or equivalent<sup>19</sup> for ICT procurements to identify applicable accessibility requirements from Section 508 standards and incorporate them into procurement and contracting documentation.
- Use the Solicitation Review Tool (SRT) or equivalent<sup>20</sup> to evaluate and improve incorporation of Section 508 standards into solicitations for ICT.
- Perform a technical evaluation and validate vendor documentation<sup>21</sup> of Section 508 conformance for ICT products under consideration prior to purchase, and after purchase, as appropriate, if the ICT product changes or is updated (version or feature change, bug fix, etc.).

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<sup>18</sup> See 48 C.F.R. §§ 11.002(f), 39.203, 7.103(q), 7.105(b)(5)(iv), 10.001(a)(3)(ix), 12.202(d).

<sup>19</sup> The Accessibility Requirements Tool (ART) ([www.section508.gov/art/#/](http://www.section508.gov/art/#/)) was developed by GSA, in consultation with the Access Board, to provide technical assistance to agencies.

<sup>20</sup> The Solicitation Review Tool (SRT) (<https://www.section508.gov/buy/solicitation-review-tool/>) was developed by GSA to provide technical assistance to agencies.

<sup>21</sup> An accessibility conformance report (ACR) documents a product's accessibility or, more specifically, documents how a product meets the applicable standards, such as the technical standards implementing Section 508. The Voluntary Product Accessibility Template (VPAT), pronounced “vee-pat”, is a commonly used industry template to assist in accessibility conformance reporting.

- Develop a plan for risk assessments and documentation of buying, developing, maintaining, and using ICT products that do not meet the Access Board’s technical standards.

### **C. Design and Develop Accessible Digital Experiences**

When designing and developing agency ICT, it is critical for the Federal Government to deliver digital experiences and environments in which all people, regardless of ability, are able to navigate, understand, and provide feedback on government information and services, to the greatest extent practicable.

Accessibility must be incorporated, unless an exception applies, from the very beginning of the design and development of any digital experience and integrated throughout every step of the ICT lifecycle, including qualitative and inclusive research, feature prioritization, testing, deployment, enhancements, and maintenance activities. Excluding accessibility from design and development efforts increases the likelihood that the website or digital service will not meet accessibility standards, which may negatively impact people with disabilities and may result in additional agency costs for remediation.

- Agencies must ensure conformance to the Section 508 standards set by the Access Board when designing or developing ICT, unless an exception applies.
- Agencies should address the needs of current and potential users with disabilities by conducting inclusive research and incorporating applicable Section 508 standards in initial design, prototyping, and pilot efforts.
- Agencies should conduct user-centered and collaborative co-design activities to identify the needs, preferences, and expectations of people with disabilities. Prior to deployment, agencies should test and validate design and development solutions with individuals with disabilities and assistive technology users.
- Agencies should conduct comprehensive testing prior to deployment to help ensure conformance with all applicable Section 508 standards.
- Agencies are encouraged to make ICT interoperable and compatible with common or frequently used assistive technology, to the greatest extent practical, and are encouraged to test and evaluate interoperability, compatibility, and the functionality of ICT with common or frequently used assistive technology. As required by OMB Circular A-130, agencies must generally support and maximize interoperability when designing or developing information systems, where appropriate.<sup>22</sup>
- Agencies should continuously monitor accessibility of ICT solutions after deployment as part of ongoing maintenance and should validate any updates to ICT solutions to ensure they will not negatively impact accessibility.

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<sup>22</sup> OMB Circular No. A-130, at 13; *see* 36 C.F.R. part 1194, app. A (502.1)

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

#### **D. Create, Communicate, and Deliver Accessible Content**

The Federal Government should create and publish online and electronic content that is inclusive and accessible for users. Increasingly, government information and services are provided digitally, which means that agencies must intensify efforts to ensure that electronic information is accessible, regardless of the information’s specific electronic or digital format, medium, or content delivery channel.

- Agencies should establish a formalized process or plan to ensure that all agency electronic communications are accessible to the maximum extent practicable, and that the agency integrates accessibility reviews of electronic content, such as testing content with people with disabilities and various assistive technologies, prior to publication and distribution, whether internal or public. This process or plan should include all electronic content<sup>23</sup> regardless of format (e.g., web content, mobile content, presentations, documents, worksheets, videos, audio recordings, and social media posts). Emergency communication should be included in these formalized processes and plans.
- In many contexts agencies must provide text alternatives to non-text electronic content, unless an exception applies, as provided by the Section 508 standards.<sup>24</sup> Such alternatives may consist of, for example, text descriptions of images or charts, and closed captioning or text transcripts for videos.
- Agencies should use HyperText Markup Language (HTML) as the default when creating and publishing content online in lieu of publishing content in other electronic document formats that are designed for printing or preserving and protecting the content and layout of the document (e.g., PDF and DOCX formats), as provided by OMB M-23-22.<sup>25</sup> This practice makes web content easier to find, use, and maintain, and makes it work more reliably with assistive technology.
- Agencies should generally avoid developing and using alternative versions (i.e., separate, accessible conforming versions of content) in lieu of making non-accessible electronic content accessible.<sup>26</sup> The use of alternative versions should be limited, to the greatest

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<sup>23</sup> “Electronic content” as used in this memorandum refers to “[e]lectronic information and data, as well as the encoding that defines its structure, presentation, and interactions.” 36 C.F.R. part 1194, app. A (E103.4).

<sup>24</sup> *Id.*, app. A (E205); Web Content Accessibility Guidelines 2.0, W3C World Wide Web Consortium Recommendation, Dec. 11, 2008, Level A & Level AA Success Criteria 1.1.1, <https://www.w3.org/TR/2008/REC-WCAG20-20081211/>

<sup>25</sup> See OMB Memorandum M-23-22, at 21-22. HTML is the standard code used to structure and design content for display in a web browser. HTML provides numerous advantages (e.g., easier to make accessible, friendlier to assistive technology, more dynamic and responsive, and easier to maintain).

<sup>26</sup> Unnecessary use of alternative versions is costly. Agencies will save time and money if they create electronic content with accessibility in mind. Therefore, agencies should strive to produce one accessible version when developing electronic content rather than developing multiple redundant versions (non-accessible and accessible). Agencies should consult [Section508.gov](http://Section508.gov) and the Web Content Accessibility Guidelines (WCAG) for best practices on alternative versions.

extent practicable, to situations where electronic content cannot be made available in one accessible version for legal or technical reasons.<sup>27</sup>

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

## **E. Evaluate, Monitor, Collect Feedback, and Remediate for Accessibility**

For digital accessibility efforts to be successful, agencies need to regularly evaluate, monitor, collect feedback, and measure accessibility efforts and take actionable steps to remediate non-conformance in a timely manner. Accessibility testing and monitoring can help agencies reduce the risk of implementing inaccessible technology and ensure issues are resolved as quickly as possible. This type of continuous improvement enables agencies to become more adaptable and resilient, realize cost-savings, and provide a digital experience the public deserves.

Outlined below are strategies for agencies to manage and maintain digital accessibility.

- Agencies should ensure systems are in place to monitor conformance with the Section 508 standards published by the Access Board. These monitoring systems should follow the entire software development lifecycle, including enterprise architecture reviews; IT program reviews; acquisition, design, development, production release reviews; and change control.
- Agency CIOs should use Section 508 conformance as a performance measure when monitoring and evaluating information technology programs and resources. If the CIO determines Section 508 conformance to be a risk or performance issue for a given program, then the CIO should advise the agency head on options for modifying or terminating the program, as appropriate.<sup>28</sup>
- Agencies should utilize the ICT Testing Baseline for Web to assist in determining web content conformance with Section 508 standards.<sup>29</sup>
- Agencies should regularly and routinely scan Federal web content using automated testing tools to help ensure conformance with the Section 508 standards set by the Access Board, including, as applicable, the Web Content Accessibility Guidelines (WCAG).<sup>30</sup> Agencies should leverage automated testing tools in combination with targeted manual

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<sup>27</sup>Agencies should use the electronic content categories set by the Access Board to identify the types of covered electronic content produced by the agency, including public facing content and official agency communications, and ensure the content meets the recommended conformance levels.

<sup>28</sup> 40 USC § 11315(c)(2); OMB Memorandum M-15-14, *Management and Oversight of Federal Information Technology*, at 13.

<sup>29</sup> The ICT Testing Baseline describes the minimum checks that must be performed to determine effectively whether online content meets Section 508 standards. The ICT Testing Baseline is not intended to be a test process itself. See <https://ictbaseline.access-board.gov/>.

<sup>30</sup> The expectation is that agencies will use automated testing tools to scan all web content on all webpages on all web-responsive hosts that the agency owns, operates, or manages, including internal-facing web content on intranets, at a set, regular frequency to identify potential instances of non-conformance. Information about additional web accessibility evaluation tools can be found on W3C websites. See <https://www.w3.org/WAI/ER/tools/>.



testing because automated testing tools cannot fully assess conformance to accessibility standards.<sup>31</sup>

- Agencies should perform manual conformance validation testing, such as the Trusted Tester Conformance Test Process for the Web, in addition to automated testing.<sup>32</sup> In situations where limited resources prevent agencies from doing routine manual testing, agencies should employ sampling strategies or prioritize manual testing for priority efforts.
- Agencies should collect qualitative feedback from users to assist in detecting inaccessible ICT and to inform remediation efforts.
- Agencies should generally use the following criteria to prioritize targeted manual testing and remediation efforts for ICT based on activities that provide information, services, benefits, and programs to the public:
  - Highest volume of traffic (e.g., transactions, customers served, or unique users to a website).
  - Volume or significance of feedback received from individuals with disabilities through the agency’s public feedback mechanism.
  - Results of user research and usability testing with individuals with disabilities.
  - Submission of Section 508 complaints or initiation of litigation due to alleged inaccessibility of services or benefits.
- Agencies should generally use the following criteria to prioritize targeted manual testing and remediation efforts for ICT that Federal employees use:
  - Extent of the product’s use among Federal employees; the inaccessibility of a common business application could have broad effects.<sup>33</sup>
  - Volume or significance of feedback received from employees.
  - Results of user research and usability testing with individuals with disabilities.
  - Submission of Section 508 complaints or initiation of litigation due to alleged inaccessibility of ICT.

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<sup>31</sup> In this context, “automated testing” refers to the application of software tools that evaluate a digital product to identify common accessibility errors and flag potential issues. “Manual testing” refers to trained individuals using a documented, consistent, repeatable process to evaluate a digital product’s accessibility against accessibility standards to determine conformance. Some criteria associated with accessibility standards are highly context-dependent, which means that human judgment is often required to appropriately determine conformance. Automated testing cannot evaluate the criteria of accessibility standards that require human subjectivity.

<sup>32</sup> The Trusted Tester Conformance Test Process is a code-inspection-based test approach for determining web content conformance to Section 508 standards. *See* [www.dhs.gov/trusted-tester](http://www.dhs.gov/trusted-tester).

<sup>33</sup> Examples of common business applications include document authoring and management software, communication and messaging software, video conferencing tools, and time and attendance systems.

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

## **F. Cultivate a Positive Culture of Digital Accessibility**

To create an accessible and inclusive environment where individuals with disabilities can interact with and use government information and services without facing needless barriers, agencies should foster a Federal ICT ecosystem that accounts for a wide range of sensory, cognitive, and physical accessibility issues; provide training for the Federal workforce and contractors, as appropriate, on accessibility responsibilities and obligations; and engage and consult with individuals with disabilities and organizations that represent individuals with disabilities.

The following are recommendations to create a sustainable and disability-inclusive agency workplace culture that aids in establishing and maintaining digital accessibility.

- Agencies should develop an internal digital accessibility strategic roadmap and align it to agency-wide strategic planning efforts<sup>34</sup> (e.g., agency strategic plans or information resource management strategic plans) and budget formulation efforts.<sup>35</sup>
- Agencies should develop an accessibility training plan that identifies appropriate training requirements for specific staff and the frequency at which it must be completed to maintain understanding of and the ability to apply Section 508 standards. Agencies should consider the incorporation of:
  - Trainings on steps all staff can use to comply with Section 508 standards (e.g., creating accessible documents), and familiarity with agency digital accessibility policy;
  - Regularly scheduled trainings for acquisition professionals on the incorporation of Section 508 requirements into acquisition activities; for IT Help Desk staff on assisting employees who use assistive technologies and identifying and troubleshooting reported ICT accessibility issues; and for staff with broad responsibilities for official communication, information dissemination activities, and outreach and engagement activities on Section 508 requirements.
- Agencies should engage regularly with employees with sensory, cognitive, and physical disabilities individually and through agency employee resource groups and consult with organizations and external individuals with disabilities to gauge whether agency ICT is enabling individuals with disabilities to have access to and use of government

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<sup>34</sup> For example, agencies may choose to incorporate the accessibility roadmap into the strategic plans required by the GPRA Modernization Act, Pub. L. No. 111-352, or the DEIA strategic plans required by the Executive Order 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*.

<sup>35</sup> “Accessibility roadmaps” should not be considered a standalone effort but an exercise to identify accessibility challenges and begin to align and incorporate accessibility efforts into organizational-wide efforts.

information and services comparable to that of members of the public without disabilities.

- Agencies should keep in mind that legal provisions other than Section 508 may impose additional obligations related to the accessibility of ICT. Under Section 501 of the Rehabilitation Act, for example, modifying ICT or providing assistive technology may constitute a reasonable accommodation for an agency employee with a disability.<sup>36</sup>
- Agencies should promote awareness about the availability of assistive technology that will help employees with disabilities access and use ICT.
- Agencies should routinely assess the needs of employees to find opportunities to acquire assistive technology that will support access to and use of information and data.
- Agencies should ensure that Section 508 program managers and employees or contractors tasked with testing and evaluating digital accessibility have appropriate expertise and have, at a minimum, participated in a certified Section 508 conformance training program, such as the Department of Homeland Security (DHS) Trusted Tester Certification Program.<sup>37</sup>

### **Immediate Agency Actions**

- Within 30 days of the issuance of this memorandum, agencies shall report to OMB the name and contact information of the agency-wide Section 508 program manager. After this action, agencies are required to report any changes to the designated agency-wide Section 508 program manager to OMB within 30 days.<sup>38</sup>
- Within 90 days of the issuance of this memorandum, agencies shall establish (or review and update, as appropriate) digital accessibility statements on all agency websites.<sup>39</sup>
- Within 90 days of the issuance of this memorandum, agencies shall establish (or review and update, as appropriate) a public feedback mechanism for receiving complaints or reports about accessibility issues with agency websites and digital services and begin to track, review, and address feedback.
- Within 180 days of issuance of this memorandum, agencies shall conduct a comprehensive assessment of agency policies to ensure that ICT accessibility considerations are incorporated in all relevant agency functions; develop a plan to update agency policies to align with the requirements of this memorandum, as needed; ensure

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<sup>36</sup> See 29 U.S.C. § 791; 29 C.F.R. § 1614.203

<sup>37</sup> A Trusted Tester follows the Revised Section 508 Conformance Test Process for Web, uses approved testing tools, and evaluates web applications for conformance with the Access Board's Section 508 standards. Trusted Testers have passed the DHS Trusted Tester Certification Exam. See <https://www.dhs.gov/trusted-tester>.

<sup>38</sup> See [Section508.gov](https://www.section508.gov) for additional information on reporting instructions.

<sup>39</sup> See accessibility statement requirements in "Section A. Establish Digital Accessibility Programs and Policies" of this memorandum.

any changes to policies are also updated in agency digital strategies; and make ICT accessibility policies publicly available.<sup>40</sup>

- Each agency shall report annually to OMB and the General Services Administration (GSA) on its compliance with Section 508, in accordance with criteria and instructions disseminated by OMB.<sup>41</sup>

### **Immediate Government-Wide Actions**

- Update resources on Section508.gov so it is the one-stop online information resource on Section 508 that includes tools and tips for program managers, information for members of the acquisition workforce, links to training, etc.:
  - Within 180 days, GSA and the Access Board, in coordination with OMB, will review and update existing government-wide resources (e.g., websites, best practices, guides, and playbooks) related to the accessibility of websites and digital services, including resources on Section 508 requirements, to identify opportunities to provide further assistance to agencies and consolidate existing resources.
    - Anticipated updates to Section508.gov include sample accessibility statements, best practices for establishing and maintaining a public feedback mechanism, and best practices for establishing and maintaining a formal Section 508 complaint process.
- Buy accessible:
  - Within one year, GSA, in consultation with the Access Board, will explore options for establishing a standardized accessibility conformance reporting process for government procurement of ICT, which should include a central repository of vendor accessibility conformance reports.
  - Within one year, GSA will establish a government-wide service to help agencies acquire products and services related to the accessibility of ICT, such as product accessibility testing, Accessibility Conformance Report (ACR) evaluations, and website and document remediation. In addition, GSA is encouraged to explore solutions that enable Digital Accessibility as a Service (e.g., consulting, testing, training, and remediation).
- Expand certifications and trainings:
  - Within 180 days, GSA, the Access Board, and the Office of Personnel Management (OPM) will review existing Section 508 professional certification programs, identify opportunities to establish a professional certification program,

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<sup>40</sup> Agencies are encouraged to consult the IT Accessibility Policy Framework at <https://www.section508.gov/manage/policy-framework/introduction/>, which recommends practices for assessing and improving policies on ICT accessibility.

<sup>41</sup> See Consolidated Appropriations Act, 2023, Pub. L. No. 117-328, § 752(a)(1)-(3). To report annual progress data to OMB, agencies should follow the reporting process (instructions and criteria) outlined on the Section 508 website. See <https://www.section508.gov/manage/section-508-assessment/>

and create and publish guidelines for acceptable commercial certifications for Section 508 program managers.

- Within 180 days, the CIO Council, in collaboration with the Chief Human Capital Officer (CHCO) Council, will develop best practices and guidelines, including standardized language for staff positions and a set of competency requirements, to improve the hiring and development of effective and qualified Section 508 program managers, digital accessibility testers, and related positions.
- Within 180 days, DHS will explore scaling the DHS Trusted Tester Certification program to provide a comprehensive accessibility testing approach that includes testing electronic documents and other relevant ICT testing practices.
- Expand assistive technology accommodation:
  - Within one year, the CIO Council, in consultation with relevant agencies and interagency bodies, will explore opportunities to establish a government-wide program to provide assistive technology devices and services or assistive technology consultation services to Federal agencies.
- Explore a Federal digital accessibility design and testing lab:
  - Within one year, GSA, in consultation with the Access Board, will explore establishing a Federal digital accessibility design and testing lab staffed with accessibility specialists who can perform automated and manual testing and assessments of agency ICT, as well as provide user research and usability testing related to the accessibility of ICT.

### **Policy Assistance**

All questions or inquiries regarding this memorandum should be addressed to the OMB Office of the Federal Chief Information Officer (OFCIO) via email: [ofcio@omb.eop.gov](mailto:ofcio@omb.eop.gov).

Additional technical assistance on Section 508 is provided by the U.S. Access Board and General Services Administration. Agencies are encouraged to make use of [Section508.gov](http://Section508.gov), which provides resources and best practices to assist with agency implementation efforts.

Attachments:

- Appendix A. Agency Roles and Responsibilities Related to Section 508
- Appendix B. Government-Wide Roles and Responsibilities Related to Section 508

## Appendix A. Agency Roles and Responsibilities Related to Section 508

<b>Roles</b>	<b>Responsibilities</b>
Agency Chief Acquisition Officer (CAO)	<ul style="list-style-type: none"> <li>• Responsible for agency performance of acquisition activities and acquisition programs, including the development of the agency’s acquisition workforce.</li> <li>• Ensures Section 508 requirements are incorporated into any ICT that is procured by the agency, in collaboration with the agency Chief Information Officer (CIO).</li> </ul>
Agency Chief Diversity and Inclusion Officer	<ul style="list-style-type: none"> <li>• Coordinates efforts to promote diversity, equity, inclusion, and accessibility within the agency.</li> </ul>
Agency Chief Information Officer (CIO)	<ul style="list-style-type: none"> <li>• Establishes the agency-wide Section 508 program, provides leadership of the program, ensures the program is adequately resourced, and appoints the agency Section 508 program manager.</li> <li>• Ensures the Section 508 program manager has sufficient delegated authority, support, and resources.</li> <li>• Ensures Section 508 accessibility considerations are incorporated into the planning, operation, and management of any ICT that is developed, used, or maintained by the agency.</li> <li>• Ensures Section 508 requirements are incorporated into any ICT that is procured by the agency, in collaboration with agency CAO.</li> </ul>
Agency Chief Human Capital Officer (CHCO)	<ul style="list-style-type: none"> <li>• Develops training plans to identify who should receive training on digital accessibility and establishes training schedules for appropriate staff on Section 508 compliance, in consultation with the Section 508 program manager.</li> </ul>
Agency Equal Employment Opportunity Officer	<ul style="list-style-type: none"> <li>• Responsible for coordinating obligations to applicants or employees with disabilities in the Federal Government under Section 501 of the Rehabilitation Act of 1973, including the reasonable accommodation and complaint processing regulations in 29 C.F.R. Part 1614.</li> </ul>
Agency Senior Procurement Executive	<ul style="list-style-type: none"> <li>• Responsible for management direction of the acquisition systems of an Executive branch agency, including the implementation of the unique acquisition policies, regulations, and standards of the agency.</li> </ul>
Agency-wide Section 508 Program Manager	<ul style="list-style-type: none"> <li>• Manages Section 508 Program on behalf of the agency CIO (or designee), to include developing and maintaining agency policies, guidebooks, and disseminating best practices.</li> <li>• Supports the agency’s efforts to create an accessible and inclusive ICT environment for all employees and members of the public with disabilities.</li> <li>• Coordinates and collaborates with other staff responsible for Rehabilitation Act compliance, including the provision of reasonable accommodations.</li> </ul>

<b>Roles</b>	<b>Responsibilities</b>
	<ul style="list-style-type: none"> <li>• Provides consultation to, or participates in, agency capital planning and/or business case development and IT governance to ensure ICT activities appropriately integrate Section 508 compliance across the IT and acquisition lifecycles.</li> <li>• Assesses and seeks to address the needs of the public and employees with disabilities with regards to ICT accessibility.</li> <li>• Manages and coordinates: <ul style="list-style-type: none"> <li>○ Assistance to acquisition officials and developers in procuring or building accessible ICT;</li> <li>○ Evaluation of web content, software, and/or hardware for Section 508 conformance;</li> <li>○ Section 508 training;</li> <li>○ Creation and review of electronic documents for Section 508 conformance; and</li> <li>○ Provision of alternative formats.</li> </ul> </li> </ul>
Contracting Officer	<ul style="list-style-type: none"> <li>• Reviews and complies with FAR section 11.002(f) and subpart 39.2 by ensuring Section 508 standards are considered in acquisition planning documents and procurement requirements for ICT and that deliverables meet accessibility standards.</li> <li>• Includes applicable Section 508 accessibility standards in requirements and acquisition planning documents and agreement, per FAR section 7.105(b)(5)(iv).</li> </ul>
Contracting Officer's Representative and Requiring Officials	<ul style="list-style-type: none"> <li>• Includes applicable Section 508 accessibility standards in acquisition planning and requirement documents.</li> <li>• Verifies that products or services delivered under an agreement meet the accessibility terms and conditions included in a contract prior to accepting deliverables.</li> </ul>
Heads of Federal Agencies	<ul style="list-style-type: none"> <li>• Ensures that individuals involved in acquisition planning and requirements specify needs, develop plans, specifications, etc. that address ICT accessibility using standards issued in 36 CFR part 1194.</li> </ul>
Information Technology Program and Project Managers	<ul style="list-style-type: none"> <li>• Consistent with the Federal Acquisition Certification for Program and Project Managers, and the Office of Personnel Management Competency Model for IT Program Management, ensures Section 508 is considered throughout the acquisition and information technology lifecycles.</li> <li>• Meets and collaborates regularly with the Section 508 program manager and reasonable accommodation program staff to ensure ICT is accessible and usable.</li> </ul>

<b>Roles</b>	<b>Responsibilities</b>
Product Managers <sup>42</sup>	<ul style="list-style-type: none"> <li>• Ensures that ICT, such as websites and digital services, meets the needs of individuals with disabilities and conforms to Section 508 standards.</li> <li>• Meets and collaborates regularly with the Section 508 program manager and other staff responsible for Rehabilitation Act compliance, including the provision of reasonable accommodations, to ensure ICT is accessible and usable.</li> </ul>
Purchase Card Holders	<ul style="list-style-type: none"> <li>• Confirms the accessibility of ICT prior to purchase.</li> </ul>

## **Appendix B. Government-Wide Roles and Responsibilities Related to Section 508**

<b>Roles</b>	<b>Responsibilities</b>
U.S. Access Board (Access Board)	<ul style="list-style-type: none"> <li>• Develops and issues Section 508 accessibility standards.</li> <li>• Provides technical assistance and trainings on Section 508 to Federal agencies.</li> <li>• Supports the development of accessibility tools and best practices.</li> </ul>
CIO Council Accessibility Committee	<ul style="list-style-type: none"> <li>• Serves as the principal interagency forum to support and improve the implementation of Section 508.</li> </ul>
Department of Justice (DOJ)	<ul style="list-style-type: none"> <li>• Collaborates with the General Services Administration to collect and evaluate information from all Federal agencies to ascertain status of compliance with Section 508.</li> <li>• Biennially prepares and submits to the President and Congress a report on and recommendations regarding the state of Federal agency compliance with Section 508 requirements, including the quantity and categorization of individual complaints that are collected and resolved.</li> </ul>
Department of Homeland Security (DHS)	<ul style="list-style-type: none"> <li>• Maintains and updates, as needed, the Trusted Tester Conformance Test Process.</li> <li>• Manages the Section 508 Trusted Tester Program, which includes training and formal accessibility testing certification for the Trusted Tester Process.</li> </ul>
Federal Acquisition Regulatory (FAR) Council	<ul style="list-style-type: none"> <li>• Incorporates Access Board standards into the Federal Acquisition Regulation (FAR) as appropriate.</li> </ul>
General Services Administration (GSA)	<ul style="list-style-type: none"> <li>• Provides Section 508 technical assistance to Federal agencies, in collaboration with the Access Board.</li> </ul>

<sup>42</sup> See OMB Memorandum M-23-22. Product managers serve in a particularly critical role in government since they translate business goals into development priorities, scope product backlogs and roadmaps, and manage value creation for users and the agency.



Roles	Responsibilities
	<ul style="list-style-type: none"> <li>• Maintains Section508.gov, in collaboration with the Access Board, as a central information resource for agencies on Section 508 management and implementation.</li> <li>• Annually prepares and submits a comprehensive report, in consultation with OMB, to Congress on the accessibility of Federal ICT, by agency and government-wide, recommendations that agencies or Congress can take to improve compliance with Section 508, and GSA activities and plans to support and improve agency compliance.</li> <li>• Leads the development and management of tools, such as the Accessibility Requirement Tool and the Solicitation Review Tool, for use in agency activities, including acquisition, IT, and Section 508 management functions.</li> <li>• Continues incorporation of Section 508 conformance metrics or Accessibility Conformance Reports (ACR) into ICT related Governmentwide Acquisition Contracts (GWAC).</li> </ul>
Office of Inspector General (IG)	<ul style="list-style-type: none"> <li>• Provides independent oversight of agency Section 508 compliance, as needed.</li> </ul>
Office of Management and Budget (OMB)	<ul style="list-style-type: none"> <li>• Develops Government-wide policies on the management of information resources, including information technology.</li> <li>• Assists agencies, including GSA, DOJ, and the Access Board, as they implement and ensure compliance with Section 508 standards.</li> </ul>