



The Complete Guide to Section 508 Compliance

Introduction

Concerned that your organization's technology may not meet the requirements of Section 508 of the Rehabilitation Act of 1973? Committing to digital accessibility, and want to make sure you understand what the law means for you?

In this guide, we'll provide a comprehensive introduction to Section 508, answering the most frequently asked questions about who it applies to, its specific requirements, and why it matters. We'll also outline a path forward for your organization to achieve, and maintain, compliance with Section 508 standards.

Let's start with the basics:

- Section 508 applies directly to U.S. federal agencies...
- ...and has implications for their suppliers.
- The law requires that agencies create, buy, and use information and communications technology (ICT) that is accessible to people with disabilities.
- Non-conformance with Section 508 standards carries legal risk for government organizations...
- ...and financial risk for their suppliers.
- Best-practice approaches to meeting Section 508 requirements combine automated tools with human expertise.



Section 508: Who, what, why, and how?

Who does the law apply to?

Section 508 of the Rehabilitation Act of 1973 applies specifically to U.S. federal government agencies. While the law does not include direct requirements for the private sector, federal agencies generally mandate that their contractors and digital technology vendors conform with its standards as well. So, if you plan to conduct business with the federal government, you will need to prove that your digital products meet the Section 508 criteria. In practice, that means completing a Voluntary Product Accessibility Template—or VPAT®—to demonstrate that your offering is accessible.

What about states?

As a federal law, Section 508 does not include requirements for state governments. However, several individual states have adopted Section 508 criteria in their own digital accessibility laws. The State of California, for example, mandates that all digital technology used by state government organizations meets Section 508 standards, while Massachusetts requires conformance with Section 508 criteria for executive department entities.

What does the law require?

In summary, Section 508 requires U.S. federal government agencies to create, buy, and use electronic and information technology that is accessible to people with disabilities.

Section 508 states that all people in the U.S., including people with disabilities, must have equal access to digital information and communications resources from federal agencies. It applies not only to public-facing web content, but also to intranet pages, internal and external software, mobile apps, video and other multimedia content, online forms, and electronic documents such as PDFs. Documentation about, and support for, these digital assets must also be accessible.

Originally published in 1973 and amended in 1998, Section 508 was updated in 2018 to reflect the dramatic technological progress of the early twenty-first century. The revised regulations cite the World Wide Web Consortium (W3C)'s Web Content Accessibility Guidelines (WCAG) Version 2.0—a set of technical guidelines designed to improve the accessibility of HTML content—as criteria for website accessibility. They also provide additional requirements for both hardware and software products, including web and mobile applications, and clarify how government systems and content should interact with accessibility features and assistive technology such as screen readers.

Why does Section 508 matter?

For federal agencies, failure to comply with Section 508 represents a significant legal risk. Multiple organizations—including the Department of Homeland Security, the Social Security Administration, and the U.S. Department of Education—have been involved in high-profile lawsuits. These legal proceedings can be time-consuming, costly, and damaging to entities' reputations.

For private-sector organizations that conduct business with the federal government, non-conformance may put existing contracts at risk. It also means that you may lose new business opportunities to more accessible competitors.

Legal and commercial consequences aside, accessibility is good for everyone—including the 1.3 billion people worldwide living with a disability. Digital products and content that conform to accessibility standards are easier and more enjoyable for all users. Conformance ensures that important information reaches the widest possible audience.

How strictly is Section 508 enforced?

After a period of relative laxness, the federal government has renewed its commitment to holding agencies accountable for complying with Section 508. In February of 2023, the U.S. Department of Justice (DOJ) released its first Section 508 compliance report in more than a decade. Just months prior, in December of 2022, Congress passed HR 2617, which called on federal agencies to meet Section 508 requirements within 100 days of its enactment. The bill also mandated that agencies report on the accessibility of their ICT within 255 days of its enactment. The results of these reports are open to the public.

How do you test for Section 508 compliance?

To meet Section 508 requirements, digital products must conform to standards including those outlined in the Web Content Accessibility Guidelines (WCAG). WCAG states that a website should be perceivable, operable, understandable, and robust for all users. For each of these four categories, WCAG provides testable success criteria, along with practical guidance for fulfilling each criterion.

Depending on which WCAG success criteria they meet, organizations can achieve one of three levels of conformance: A, AA, or AAA. Level A indicates the most basic level of accessibility, while AAA represents the peak of what can typically be achieved. Because Section 508 requires conformance with WCAG version 2.0 Level AA, organizations striving to become compliant should test their existing products and services—both internal and external—for the WCAG criteria necessary to achieve this intermediate level.

Automated tools can help you quickly evaluate web assets' WCAG conformance. However, many potential accessibility issues can only be detected by a human expert. For that reason, it's wise to choose a digital accessibility solution that supports both automated and manual testing.

Whether you handle the work internally or enlist the help of an external partner, referencing WCAG will enable your organization to produce and prioritize a list of accessibility errors for remediation. And while WCAG applies specifically to HTML assets, its criteria are applied to non-HTML assets, such as software and non-web documents, in the Section 508 standards. Many technology vendors, including Adobe and Microsoft, also provide product-specific guidance for creating content that meets accessibility requirements.



For more information on WCAG conformance,

and whether your ICT
meets each standard,
request our interactive
[WCAG checklist](#).



How do you meet Section 508 requirements?


To meet Section 508 standards, most organizations start by ensuring their digital products conform to WCAG 2.0 Level AA. This is typically accomplished through a combination of automated tools and human expertise. While automated testing offers a low-cost way to identify and remedy simple accessibility errors, expert support is necessary for finding and addressing more complex issues. Adherence to Section 508 standards also often requires implementing back-end adaptations to support common assistive technologies.

Importantly, digital accessibility is an ongoing journey rather than a one-off exercise. Each time you add or update digital content, you will need to monitor, test, and remediate to ensure that it is accessible. And each time the legislation changes or the WCAG standards are updated, you will need to re-verify conformance across all your existing digital systems and content.

Finding success in this dynamic environment implies the need for organizational change. To maximize speed and minimize cost, a best practice is to think about accessibility as early as possible in any new digital project. Because most organizations lack the knowledge and tools to accomplish this alone, it's wise to supplement internal education and automated technologies with the ongoing support of a third-party expert—even after Section 508 standards are initially met.

Action items: Four steps for starting your digital accessibility journey

- 1 Determine which of your digital assets are in the scope of Section 508.
- 2 Implement a software solution to evaluate these assets' level of WCAG conformance.
- 3 Set up a structured program of remediation.
- 4 Seek guidance on training and tooling from a third-party accessibility expert.



Achieve and maintain Section 508 compliance with the only federally authorized platform partner

As the leading provider of digital accessibility solutions, Level Access is uniquely equipped to help your organization meet Section 508 requirements. Our hybrid approach combines advanced software with expert managed services in testing, remediation, training, and legal support.

Our team includes individuals who hold the Section 508 Trusted Tester Certification from the Department of Homeland Security's Office of Accessible Systems & Technology (OAST). They have an in-depth understanding of the federal government's own baseline tests and are certified to perform testing for organizations that need to meet these requirements.

Additionally, Level Access's Accessibility Management Platform (AMP) is the only digital accessibility platform on the market that is authorized by the Federal Risk and Authorization Management Program (FedRAMP). This makes us uniquely equipped to help government agencies and their contractors achieve their digital accessibility goals in a cost-effective, low-risk manner through efficient testing, reporting, guidance, and learning resources. By working with a FedRAMP-authorized vendor, you can sell faster and more easily to organizations that require conformance with Section 508 standards.

AMP provides advanced yet easy-to-use accessibility testing tools that enable agencies and contractors to schedule and run automated tests. The solution also includes actionable resources for understanding and meeting industry requirements, combined with versatile reporting on compliance risks and support for prioritizing remediation initiatives.



Let's get started

No matter where you are on your accessibility journey, Level Access can help you achieve and maintain compliance with Section 508.

Engage with our team today.

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