

DEMYSTIFYING SECTION 508

An Industry Guide to Understanding Section 508 of the Rehabilitation Act

Version 1.0 - November 2021

Developed by NASA to Support Government-wide Industry Outreach
Efforts

This guide serves to increase your awareness and demystify the process of creating an Accessibility Conformance Report (ACR) for your product, regardless of your experience level with Section 508

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QUICK NAVIGATION

The following set of questions will allow you to find all the information you need and nothing you don't.

Jump to
'How to Complete
an ACR'

Are you familiar with Section 508?

Yes, go to next question

No, take me to the part about Section 508

Jump to
'Frequently Asked
Questions'

Do you want to know how Section 508 exceptions are granted?

No, go to next question

Yes, take me to the part about Exceptions

Are you familiar with the acronym ICT?

Yes, go to next question

No, take me to the part about ICT

Do you know what an ACR is?

Yes, go to next question

No, take me to the part about ACRs

Do you know what a VPAT® is?

Yes, go to next question

No, take me to the part about the VPAT

Are you familiar with the acronym WCAG?

Yes, go to next question

No, take me to the part about the WCAG

Do you want some tips on how to complete an ACR?

No, go to the FAQ

Yes, take me to the part about Completing an ACR

508 OVERVIEW

What is Section 508?

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The Rehabilitation Act of 1973 was amended by Congress in 1998 to “require Federal agencies to make their electronic and information technology (EIT) accessible to people with disabilities.”¹ This amendment, known as Section 508, “applies to all Federal agencies when they develop, procure, maintain, or use electronic and information technology.”¹ Under this amendment, Federal agencies must make technology accessible to its employees and members of the public who have disabilities in a comparable manner to those without disabilities.

The original Section 508 Standards were issued in 2001. To keep up with the changing technology, the U.S. Access Board published the Revised Section 508 standards in 2017, which went into effect on January 18, 2018. These standards were updated to make the previous requirements more understandable while enhancing the accessibility to technology.

Why is Section 508 Important?

Imagine not being able to understand important information on a flyer, or not being able to access an entire portion of a website solely because of a disability you have. Approximately 61 million adults² in the United States have some type of disability. This number is only increasing as the population ages and develops disabilities. In addition to the aging population, disabilities can happen to anyone, at any time, and it is imperative that every person, non-disabled or disabled, can have equal access to technology to continue to perform their jobs and daily tasks.



Creating accessible technology is not only a recommendation but a necessity. Our world is moving towards full accessibility, and Section 508 helps achieve this for the U.S. Federal government.

Benefits of Section 508

Who does Section 508 help? Everyone!


Accessible technology benefits everyone. Here are some examples of how you may have benefited from accessible technology features in the past without even noticing:


- **Color Contrast** benefits not only those with low-vision or color deficiencies, but also elderly people and those in different lighting environments. For example, viewing an electronic article in the sunlight may cause a glare on your screen, making it difficult to read things with low color contrast.

This is an example of good color contrast.

This is an example of bad color contrast.

- **Closed Captioning (CC)** for videos helps people who are deaf or hard of hearing and others who are viewing the video in a loud environment, for example.
- **Keyboard-only navigation** does not only help people with motor impairments and those who use screen-readers. It also benefits users who may be injured or whose mouse/trackpad doesn't work on their laptop.
- **Large target sizes** not only help people with motor impairments but also makes it easier to click buttons for people who are using their mobile devices, for example.

This is an example of having a large target size. 

This is an example of having a small target size. 

What's the difference between the Americans with Disabilities Act (ADA) and the Rehabilitation Act?

The Americans with Disabilities Act (ADA) states that all areas of public life, including technology, and the areas of private life which are open to the general public, must be accessible for people with disabilities. While both the ADA and the Rehabilitation Act were created to prohibit discrimination, the Rehabilitation Act applies only to Federal agencies and departments, while the ADA applies to local and state governments, nonprofits, and businesses.

My company currently does not sell products to the Federal government. Does Section 508 still apply to the products I sell?

If your company sells, or has plans to sell, to the Federal government, then Section 508 does apply. Making sure your product is accessible and usable to everyone will add value to your products and make them more marketable to a wider range of customers.

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Are there waivers or exceptions that we can claim?

There are no waivers to Section 508. There are, however, Exceptions provided within the law that Federal agencies and departments may claim based on how the product will be used. These exceptions cannot be claimed by Industry.

INFORMATION AND COMMUNICATION TECHNOLOGY DEFINED

What is ICT?

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The U.S. Access Board defines Information and Communication Technology (ICT) as any “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 associate content.”⁴

Section 508 applies to anything fitting the definition of ICT.

Is there a difference between ICT and IT?

ICT is the broader term that includes Information Technology (IT) and communications technology.

The U.S. Code states that IT “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— (i) of that equipment; or (ii) of that equipment to a significant extent in the performance of a service or the furnishing of a product;”⁵

This includes computers, ancillary equipment, peripheral equipment designed to be controlled by the central processing unit of a computer, software, firmware, and similar procedures, services, and related resources. This does not include any equipment acquired by a federal contractor incidental to a federal contract.⁵

Communication technologies such as e-mail, social media, and video calls are not considered IT. However, they do fall under ICT. The computer device itself would be considered IT until it starts incorporating communication methods. Section 508 applies to ICT, not just IT.

EIT vs ICT?

What used to be referred to as Electronic and Information Technology (EIT) changed to Information and Communication Technology (ICT) in the Revised Section 508 Standards to acknowledge advances in technology and inclusion of Section 255 of the Communications Act.

What are some less common examples of ICT?

Here are just a few examples of products that you wouldn't think are considered ICT, but they actually are: Spectrometers, Oscilloscopes, Peripherals, Sensors, Support documentation, Robotics, Lasers, Radar, Educational Software, e-Training Courses, Electronic microscopes, Software add-ins.

If you're unsure whether your product is considered ICT, it probably is!

ACCESSIBILITY CONFORMANCE REPORTS

What is an ACR?

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An Accessibility Conformance Report (ACR) is a document that provides information regarding the level of accessibility of a product based on the Section 508 Technical Standards. This report is developed by Industry.

[Click here for a step-by-step tutorial on how to complete an ACR.](#)

Are there different methods for developing an ACR?

An ACR may be completed in various ways. These include using the Voluntary Product Accessibility Template (VPAT) provided by the Information Technology Industry Council to complete your own report, having an independent vendor complete it, or using your own template or checklist. Any of these methods may be used to produce an ACR, as long as all the applicable Section 508 Technical Standards have been addressed.

What is a VPAT?

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A Voluntary Product Accessibility Template (VPAT) is a template created by the Information Technology Industry (ITI) Council that is used to document a product's conformance with Section 508 Technical Standards. Using a VPAT, pronounced "vee-pat", is the most common method used by industry to develop an ACR.

Is an ACR voluntary?

No. This confusion likely comes from the word "Voluntary" in the VPAT acronym. While the use of the VPAT is voluntary to generate an ACR, the requirement for Federal agencies to obtain ACRs is not voluntary.

What is WCAG?

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The Web Content Accessibility Guidelines (WCAG), pronounced “wuh-cag”, are international standards that require making digital content accessible to users regardless of disability status⁴. WCAG includes a set of testable success criteria that determine whether certain features of your product are accessible. WCAG are split into three levels: Level A, Level AA, and Level AAA. Each level presents an increasingly higher level of accessibility. **Section 508 only requires WCAG 2.0 Levels A and AA guidelines to be met.**

Does WCAG only apply to “web” content?

No. Although the 'W' in the acronym stands for ‘web’, the Revised Section 508 Standards include WCAG 2.0 and make it applicable to Software, Electronic Content, as well as Web Content. In essence, WCAG 2.0 is applicable to any content provided through a user interface. Although WCAG was written for web content only, Section 508 applies WCAG to more than web content. For example, Chapter 5 of the Revised Section 508 Standards states that occurrences of the word “Web page” or “page” should be replaced with the word “software”. If your product is software or non-web documentation, all WCAG success criteria are required in your ACR, if applicable, except the following four standards:

- 2.4.1 Bypass Blocks (Level A)
- 2.4.5 Multiple Ways (Level AA)
- 3.2.3 Consistent Navigation (Level AA)
- 3.2.4 Consistent Identification (Level AA)

HOW TO COMPLETE AN ACR

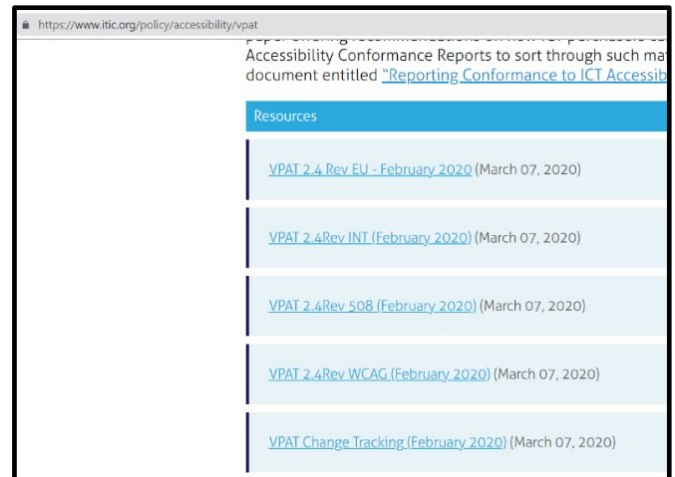
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The ACR is a representation of how the product meets the applicable Section 508 Technical Standards. The product owner/developer must first test the product against those standards in order to complete an ACR. The most common way an ACR may be completed is by using the template (VPAT) created by the IT Industry Council (ITI). Although there are other possible methods to complete an ACR ([click here to review the different methods of completing an ACR](#)), this part of the guide will walk you through how to complete an ACR using the VPAT.

Step 1: Download the VPAT

The VPAT is a free template that may be downloaded by going to the [ITI website](#).

On the bottom of this webpage, you will find four editions of the VPAT 2.x Rev: EU, INT, 508, and WCAG. If you are selling to the U.S. Federal government, then you must use the Revised Section 508 Edition or the INT International Edition (which includes all Revised Section 508 requirements and additional international requirements).

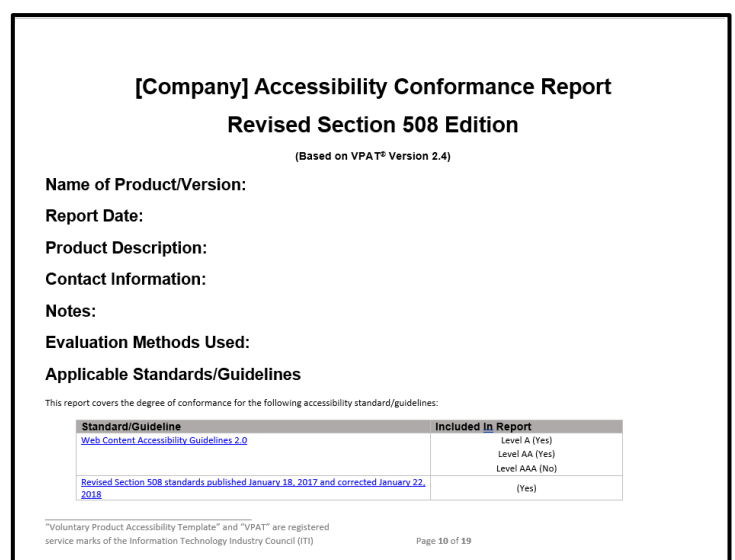


Step 2: Complete the Accessibility Conformance Report (ACR) title page

The VPAT begins with several pages of instructions. Please read all of the instructions carefully, and remove the instruction pages when you submit your final ACR.

Find the page with the heading, “[Company] Accessibility Conformance Report Revised Section 508 Edition”. As noted in the [ITI VPAT training videos linked below](#), the following information must be provided:

- Company name
- Name of your product (and version number, if applicable)
- Report date (month and year)
- Description of the product
- Contact information
- Additional notes (if any)
- Evaluation methods: Information about how your product was tested (manual, automated, both), testing tools used, etc.

A screenshot of the title page of an Accessibility Conformance Report (ACR). The title is "[Company] Accessibility Conformance Report Revised Section 508 Edition (Based on VPA™ Version 2.4)". Below the title, there are several sections: "Name of Product/Version:", "Report Date:", "Product Description:", "Contact Information:", "Notes:", "Evaluation Methods Used:", and "Applicable Standards/Guidelines". The "Applicable Standards/Guidelines" section contains a table with two columns: "Standard/Guideline" and "Included in Report". The table lists "Web Content Accessibility Guidelines 2.0" and "Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018". The "Included in Report" column shows "Level A (Yes)", "Level AA (Yes)", "Level AAA (No)", and "(Yes)". At the bottom, there is a footer: "Voluntary Product Accessibility Template™ and VPAT™ are registered service marks of the Information Technology Industry Council (ITI) Page 10 of 19".

Screenshot of page 10 of the VPAT 2.4

Step 3: Understand the three columns of the VPAT tables

First column: “Criteria”

The first column of the tables states the criteria to be covered by that particular row.

Second column: “Conformance Level”

The second column in the tables is labeled conformance level. We will cover the nuances between different tables below.

For the category or categories which encompass the product, you must use one of four phrases—supports, partially supports, does not support, not applicable— to describe the level of conformance.

- **Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports:** Some functionality of the product does not meet the criterion.
- **Does Not Support:** The majority of product functionality does not meet the criterion.
- **Not Applicable:** The criterion is not relevant to the product.

Note: The “not evaluated” phrase may only be used for the Level AAA table since this is the only success criteria table that is not required to be completed.

Third column: “Remarks and Explanations”

The third column is reserved for remarks, which are required if the product either **partially supports** or **does not support** the guideline. If the product **supports** a particular guideline, then no remarks are required but are encouraged.

Step 4: Complete Table 1: Success Criteria Level A and Table 2: Success Criteria Level AA, if applicable

If your product fits one or more of the following categories, then the WCAG 2.0 Standards apply to your product.

1. Web Content
2. Electronic Documents
3. Software
4. Authoring Tool

If your product does not fall under any of these four categories, you may write “Not Applicable” in the notes section for the Success Criteria tables.

The Success Criteria tables—Level A, Level AA, and Level AAA—cover the WCAG success criteria.

Only Level A and AA are required in an ACR. However, if your product does satisfy some (or all) Level AAA success criteria guidelines, then it is beneficial to complete that table as well, as it would provide additional motivation for Federal agencies to purchase your product and attract a wider range of potential customers.

Below is an example of what these three columns look like for the WCAG table:

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Also applies to: • 501 (Web)(Software) • 504 2.(Authoring Tool...) • 602.3 (Support Docs)	Web: Software: Authoring Tool...	Web: Software: Authoring Tool...

Step 5: Determine the applicability of the Revised Section 508 Technical Standards to your product

There are four Revised Section 508 tables, labeled as Chapter 3 (Functional Performance Criteria), Chapter 4 (Hardware), Chapter 5 (Software), and Chapter 6 (Support Documentation and Services). Complete the applicable tables.

If there are functions in your product not addressed by Chapters 4 or 5, then your product needs to conform to the criteria in Chapter 3: Functional Performance Criteria.

Does your product contain hardware?

Complete Chapter 4: Hardware.

Does your product contain non-web software?

Complete Chapter 5: Software.

Does your product contain support documentation and services?

Complete Chapter 6: Support Documentation and Services.

If your product cannot be evaluated using the current criteria,

Complete Chapter 3: Functional Performance Criteria.

For each table, there is a section for notes. Use this field to enter comments about overall applicability of the table to your product.

The first column "Criteria" of the Revised Section 508 tables lists the Section 508 Technical Standards. By clicking on the links provided in this column, you may access more information about the standards on the U.S. Access Board website.

Below is an example of what these three columns look like for the Revised Section 508 table.

Criteria	Conformance Level	Remarks and Explanations
402 Closed Functionality	Heading cell – no response required	Heading cell – no response required
402.1 General	Heading cell – no response required	Heading cell – no response required
402.2 Speech-Output Enabled	Heading cell – no response required	Heading cell – no response required
402.2.1 Information Displayed On-Screen		
402.2.2 Transactional Outputs		
402.2.3 Speech Delivery Type and Coordination		
402.2.4 User Control		
402.2.5 Braille Instructions		

Step 6: Final checklist to make sure your ACR is complete

- Are you using the correct version?** Make sure you're using a current version of the VPAT to build your ACR! A current version addresses the Revised Section 508 Technical Standards (International Edition acceptable). The current version of the VPAT is 2.4. Any VPAT 2.x is acceptable. You may find the VPAT on the ITI website at the following link: <https://www.itic.org/policy/accessibility/vpat>.
- Did you exclude the first several pages of instructions?** Delete the instruction pages (up to the heading, "[Company] Accessibility Conformance Report Revised Section 508 Edition") from your completed ACR.
- Did you complete the information fields at the top of the ACR?** Make sure you complete all seven fields (shown in Step 2), including the product information, contact information, and evaluation methods.
- If applicable, did you complete the Success Criteria, Level A and Level AA tables?** If your product contains web-based content, electronic documents, software, or authoring tools, make sure you complete the Level A and Level AA tables.
- If applicable, did you complete the Chapter 3: Functional Performance Criteria table?** If your product does not contain any applicable standards from the Level A and AA tables, then complete the Chapter 3: Functional Performance Criteria table.
- Did you skip the Level AAA tables?** Section 508 does not require that your product be tested against the Level AAA Technical Standards. However, Industry may provide this information to show a higher level of accessibility than required.
- If applicable, did you complete the tables under the Revised Section 508 Report section?** If your product contains hardware, software, or support documentation and services, be sure to complete the applicable Revised Section 508 table.
- Are you using the correct phrases to describe conformance levels?** Check to see if all phrases under conformance level match one of the following: Supports, Partially Supports, Does Not Support, Not Applicable.
- Did you complete the remarks column?** If the conformance level is either "Partially Supports" or "Does Not Support," then be sure that you explain further in the respective remarks column.
- Is your ACR document accessible?** Make sure to check your final ACR for accessibility and remediate as necessary!

FREQUENTLY ASKED QUESTIONS

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How do I determine if my product is compliant with Section 508?

Industry is expected to test its products against the applicable Section 508 Technical Standards and then reports which standards the product supports, partially supports, or does not support so that the U.S. Federal government may consider purchasing the product. This information is provided by Industry in an Accessibility Conformance Report (ACR). If the product supports all of the applicable Section 508 Technical Standards, the product is considered compliant with Section 508.

How do I know which version of the VPAT to use?

The Information Technology Industry Council developed a template called the “VPAT” which includes all the relevant Section 508 Technical Standards required by the Revised Section 508 rule (2017). ITI has several templates that apply internationally. Be sure to use the VPAT that includes the Revised Section 508 Standards (Rev508 or RevINT Version 2.x). For the most recent version of the VPAT, go to the [ITI website](#).

I have not completed a VPAT/ACR before. Why am I being required to complete it now? Isn't the VPAT voluntary?

The U.S. Federal government must buy Information and Communication Technology (ICT) that is accessible per Section 508 of the Rehabilitation Act. The government asks Industry to submit an Accessibility Conformance Report so that the accessibility of a product may be evaluated. Without the ACR, the government may not proceed with the purchase unless there is a special use case exception that the government -- never Industry -- may claim in which the ACR will not be required. You are being asked to complete the ACR so that your product may be considered for purchase.

There are several methods for completing an ACR. The VPAT, which is a template developed by the IT Industry Council (ITI), is the most common method for completing an ACR since it provides all the relevant Section 508 Technical Standards and instructions on how to complete a report in one tool. While the use of the VPAT itself is not required, it is not voluntary to complete an ACR if you wish the government to consider purchasing your product.

My company created an ACR for a product years ago. May I use that same ACR today?

Every time your product is changed or updated (e.g. version change, bug fix, etc.), an updated ACR is required that addresses any changes in the product's accessibility. Also, if you created an ACR using the Original Section 508 Standards from 2001, you must update your report using the Revised Section 508 Standards published in 2017.

Should I complete an ACR if my product is not fully accessible? How can having a completed ACR for my product benefit my company?

Yes. Completing an ACR is a win-win situation for Industry and the government. When Industry develops an ACR, it opens the door for the Federal government to purchase your product. Your ACR shows customers that your company takes accessibility seriously. Even if the ACR shows that not all the applicable Section 508 Technical Standards have been met, it allows your product to be evaluated against comparable products for accessibility. If you have an ACR and a competitor's product doesn't, you will always be the most conformant with the Section 508 standards. Completing an ACR raises your awareness of your product's accessibility and allows you to take steps to make your product more accessible and reach a broader customer base.

My product is not web-based. Do the WCAG 2.0 (Web Content Accessibility Guidelines) apply to my product?

In the Revised Section 508 Technical Standards, electronic content and software are required to conform to WCAG 2.0 Level A and Level AA Success Criteria and Conformance Requirements. While the WCAG obviously apply to web products, they also apply to **all** electronic content and software.

My product has support documentation, hardware, and a mobile application. Do I need to complete three separate ACRs?

No, you may complete one ACR that addresses all the relevant standards and criteria that match the functionality of your product. You may provide separate ACRs, if you desire.

My product is an add-on for an existing product from a separate company. Am I responsible for completing the ACR for my product, or will the other company create the ACR?

You are responsible for completing an ACR for the product you developed.

My product does not conform to all the relevant Section 508 Technical Standards. Will this prevent the Federal government from purchasing my product?

No. Your product will be still be considered for purchase even if all of the Section 508 Technical Standards are not met. Your product will be compared to other comparable commercially available products. The product that is most accessible and meets customer requirements may be purchased.

What do I enter under the columns "Conformance Level" and "Remarks and Explanations"?

In the Conformance Level column, you enter terms to describe to what extent your product meets a specific standard. Conformance Level terms are: Supports, Partially Supports, Does Not Support, or Not Applicable. If your product Partially Supports or Does Not Support the standard, you should provide a comment in the Remarks and Explanations column that indicates how the standard is not met/fully met.

My product contains both software and support documentation. Which sections of the VPAT do I need to complete?

If your product contains software, there are two sets of Section 508 Technical Standards within the report that you must complete:

- WCAG 2.0, Table 1: Success Criteria Level A and Table 2: Success Criteria Level AA.
- Revised Section 508, Chapter 5: Software.

For electronic support documentation, complete the Revised Section 508, Chapter 6: Support Documentation and Services section.

REFERENCES

1. "IT Accessibility Laws and Policies." IT Accessibility Laws and Policies | Section508.Gov, July 2020, www.section508.gov/manage/laws-and-policies.
2. "Disability Impacts All of Us Infographic." *Centers for Disease Control and Prevention*, Centers for Disease Control and Prevention, 16 Sept. 2020, www.cdc.gov/ncbddd/disabilityandhealth/infographic-disability-impacts-all.html.
3. "Disability and Health." *World Health Organization*, World Health Organization, 1 Dec. 2020, www.who.int/news-room/fact-sheets/detail/disability-and-health.
4. "U.S. Access Board." *Revised 508 Standards and 255 Guidelines*, www.access-board.gov/ict/#C103.4.
5. "40 U.S.C. 11101(6)." <https://www.govinfo.gov/Content/Pkg/USCODE-2016-title40/Pdf/USCODE-2016-title40-SubtitleIII-chap111-sec11101.Pdf>.
6. Web Content Accessibility Guidelines (WCAG) 2.0, www.w3.org/TR/WCAG20/.
7. Information Technology Industry Council Training Videos, <https://www.itic.org/policy/accessibility/vpat-training>.