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Office of Audits and Evaluations

DEPARTMENT OF VETERANS AFFAIRS

VA Should Enhance Its Oversight to Improve the Accessibility of Websites and Information Technology Systems for Individuals with Disabilities

Audit

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Executive Summary

VA provides health care and benefits to millions of veterans with disabilities connected to their military service. Ensuring those veterans have access to the department’s information and communications technologies is essential to accomplishing the VA’s mission. Beyond veterans with disabilities and their family members, however, VA must make information from its websites, related resources, and data systems (unless otherwise prohibited) accessible to a broader audience. This audience includes VA employees and contractors, members of the public, Congress, veterans service organizations, and any other stakeholders seeking information or services and data from VA. Specifically, Section 508 of the Rehabilitation Act of 1973 establishes guidelines for technology accessibility and dictates that VA and other federal agencies develop, procure, maintain, and use information and communications technology to ensure people with disabilities have access to all information and data comparable to that of individuals without disabilities.¹ The VA Office of Inspector General (OIG) conducted this audit to address concerns from Congress and a veterans service organization about the accessibility of VA websites and information systems for people with disabilities.²

As a reflection of congressional interest, VA also is required to report to Congress the status of its progress in ensuring its internal and public-facing websites comply with Section 508.³ In September 2021, VA reported to the House and Senate Committees on Veterans’ Affairs that 41 of 462 internet sites (9 percent) and 22 of 350 intranet sites (6 percent) were fully compliant.⁴ VA indicated it would conduct comprehensive website audits, website and portable document format (PDF) remediation, and training to “ensure ongoing legal and technical compliance.”

In June 2022, several congressional leaders told the VA Secretary that VA’s September 2021 report was incomplete, lacked key details, and failed to meet legal requirements. The report did not include a detailed remediation schedule with an explanation of how it would prioritize websites or sustain involvement from stakeholders with different disabilities. The congressional

¹ Section 508 of the Rehabilitation Act of 1973 was amended by 29 U.S.C. § 794d, Electronic and Information Technology (2018); Information and Communication Technology Standards and Guidelines, 36 C.F.R. Part 1194 (2017). The guidelines require that, for Section 508-covered information and communication technology, all web and nonweb content and software—including for example, websites, intranets, PDF documents, and systems—conform to the Web Content Accessibility Guidelines 2.0, a globally recognized and technologically neutral set of accessibility guidelines for web content.

² The veterans service organization was the Blinded Veterans Association, which is dedicated to assisting veterans with sight loss and their families. The association raised concerns with the OIG about the accessibility of VA systems.

³ Department of Veterans Affairs Website Accessibility Act of 2019, Pub. L. No. 116-213, 134 Stat. 1024 (2020).

⁴ VA, *VA Website Accessibility Act of 2019, Report on the Accessibility of Websites of the Department of Veterans Affairs to Individuals with Disabilities*, September 29, 2021.

leaders requested a revised report.⁵ Although they did not require the revised report by a specific deadline, VA responded on July 29, 2022.⁶

What the Audit Found

The audit team reviewed Section 508 requirements and VA policies and procedures to assess whether VA has taken sufficient actions to comply with information and communications technology accessibility requirements related to its relevant information technology systems and websites. Specifically, the team assessed whether VA was complying with its own guidance and taking the actions necessary to ensure websites and information technology systems are accessible to individuals with disabilities. The OIG acknowledges that VA is working toward addressing compliance concerns about accessibility of its information and communications technology by prioritizing websites that receive the most visits and planning to then address those with fewer views.

However, the OIG found areas where VA's efforts and monitoring could be improved. For instance, web managers did not meet their responsibilities to ensure compliance with Section 508 requirements. Web communications offices also did not consistently enforce the requirement that web managers add and certify all internet and intranet sites in the Web Registry.⁷ As a result, VA's September 2021 report to Congress did not include all VA websites as required, such as over 218,000 sites on SharePoint Online (an application used to create internal intranet websites for use by personnel and contractors) and about 5,200 websites, both public-facing and internal, that were not included in the Web Registry.⁸

From October 2021 to December 2022, the VA Section 508 Office did not have a scanning tool to track website compliance. The need for such a tool had been unaddressed because the VA contract for website-scanning services ended in November 2021. A new contract was awarded in July 2022, but a bid protest of the award was not resolved until December 2022.⁹ Since February 2023, a contractor has been conducting limited scans of VA's public-facing websites

⁵ Sens. Bob Casey et al., letter to VA Sec. Denis McDonough, June 6, 2022.

⁶ VA Sec. Denis McDonough, letter to Sen. Robert P. Casey Jr., July 29, 2022.

⁷ The Web Registry, VA's official repository of websites, contains but is not limited to the following fields: status, URL, location, site name, registration type, organization, content point of contact, purpose, 508-compliant status, privacy statement on website, created on, created by, and modified on. This information must be certified as accurate annually or as changes occur.

⁸ VA, *VA Website Accessibility Act of 2019, Report on the Accessibility of Websites of the Department of Veterans Affairs to Individuals with Disabilities*. SharePoint Online is a cloud-based service, hosted by Microsoft, for the creation of limited-access intranet websites, <https://answers.microsoft.com/en-us/msoffice/forum/all/sharepoint-online-vs-sharepoint-2019/2a45c311-8747-434b-bb89-57c452d384f7>.

⁹ A bid protest is a challenge to the award or proposed award of a contract for the procurement of goods and services or a challenge to the terms of a solicitation for such a contract, <https://www.gao.gov/legal/bid-protests/faqs>.

because the tool has not received an authority to operate.¹⁰ However, according to VA Section 508 Office managers, the office had full scanning and reporting functionality for internet websites as of August 2023 and expected it for intranet and SharePoint websites in October 2023. These scans would use more expansive data sources for a more comprehensive inventory.

In addition to its websites, some VA information technology systems had not been assessed for compliance with Section 508 requirements.¹¹ Also, some of the Section 508 designations in the VA Systems Inventory were found to be inaccurate because administrations and staff offices did not update or validate them.¹² This occurred in part because VA officials did not ensure information system owners were aware of accessibility requirements or their duty to carry out the procedures found in VA policies.¹³ The OIG also determined that VA had three directives related to accessibility, systems management, and web-based collaboration technologies that had not been recertified within required timelines.¹⁴ VA's enterprise directives management procedures require that all permanent directives and handbooks be recertified within five years of issuance to ensure consistency with other enterprise directives and handbooks.¹⁵ Until VA addresses all compliance issues, the information access provided to individuals with disabilities may not be comparable to the access provided to those without disabilities.

What the OIG Recommended

The OIG recommended the assistant secretary for information and technology and chief information officer develop and implement a strategy with milestones for identifying all VA websites, confirm their inclusion in VA's Web Registry as the current system designated by policy, certify their accuracy annually or as changes occur, and establish a mechanism for web communication offices across VA to enforce web policy. System owners should also be educated on policy requirements to request accessibility audits and ensure information technology system accessibility designations are accurate in the VA Systems Inventory. The OIG also recommended the chief information officer and the assistant secretary for public and intergovernmental affairs update and republish relevant VA directives.

¹⁰ Authority to operate is a formal declaration by a designated approving authority that authorizes the operation of a business product and explicitly accepts the risk to the agency. The authority to operate is signed after a certification agent confirms that the system has passed all requirements to become operational.

¹¹ For more information on the systems assessed for compliance, see appendix A.

¹² VA Directive 6404, *VA Systems Inventory*, February 23, 2016. VA Systems Inventory designates systems as Section 508 compliant, noncompliant, or unassessed.

¹³ VA Handbook 6221 *Accessible Information and Communications Technology*, February 13, 2019. VA officials include under secretaries, assistant secretaries, and other key officials. VA Directive 6404.

¹⁴ VA Directive 6221, *Accessible Information and Communications Technology*, October 16, 2017; VA Directive 6404; and VA Directive 6515, *Use of Web-Based Collaboration Technologies*, June 28, 2011.

¹⁵ VA Handbook 0999, *Enterprise Directives Management Procedures*, August 1, 2019.

VA Management Comments and OIG Response

The assistant secretary for information and technology and chief information officer, in collaboration with the Office of Public and Intergovernmental Affairs, concurred with all recommendations and provided acceptable corrective action plans. The full text of the assistant secretary's comments and an action plan appear in appendix B.

The assistant secretary's planned corrective actions are generally responsive to the recommendations and address the issues identified in the report. However, while the assistant secretary concurred with recommendation 1, he did not specifically mention a strategy for identifying all VA websites. Also, the assistant secretary concurred with recommendation 5 but did not indicate VA Directive 6221 would be updated, recertified, and republished. Moreover, for recommendations 1, 2, 4, 5, and 6, the assistant secretary gave target dates that exceed the time allotted for implementation. The OIG recognizes the scope of the recommended actions and agrees with the time frames. The OIG will monitor progress by the Office of Information and Technology and follow up on the implementation of the recommendations until all proposed actions are completed.



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Abbreviations

NCA	National Cemetery Administration
OIG	Office of Inspector General
OIT	Office of Information and Technology
PDF	portable document format
URL	uniform resource locator
VBA	Veterans Benefits Administration
VHA	Veterans Health Administration



Introduction

VA provides health care and benefits to millions of veterans with disabilities connected with their military service. VA’s mission requires that it ensure all veterans have access to information and communication technology. VA also has obligations that extend beyond veterans with disabilities and their families. Any individual with a disability who desires access to information from VA websites, related resources, and data systems (unless otherwise prohibited) must find these resources accessible. Section 508 of the Rehabilitation Act of 1973 establishes guidelines for ensuring access to information technology and data by individuals with disabilities. Specifically, Section 508 dictates that VA and other federal agencies develop, procure, maintain, and use information and communications technology to ensure people with disabilities have access to all information and data comparable to that of individuals without disabilities.¹⁶

The Department of Veterans Affairs Website Accessibility Act of 2019 also requires VA to report to Congress on how well its internal and public-facing websites comply with Section 508.¹⁷ In September 2021, VA reported to the House and Senate Committees on Veterans’ Affairs that 41 of 462 public-facing internet sites (9 percent) and 22 of 350 intranet (internal) sites (6 percent) were fully compliant.¹⁸ A website is considered noncompliant if any of its individual pages or linked documents do not meet Section 508 requirements. VA also indicated it would conduct comprehensive website audits, website and portable document format (PDF) remediation, and training to “ensure ongoing legal and technical compliance.”

In June 2022, the chairs and ranking members from the Senate Special Committee on Aging, Senate and House Committees on Veterans’ Affairs, and two House Veterans’ Affairs subcommittees told the VA Secretary that its September 2021 report was not compliant with reporting requirements and requested a revised report be submitted with the omitted information.¹⁹ In particular, the 2021 report lacked key details and failed to meet Website Accessibility Act requirements such as a detailed remediation schedule. The report also failed to

¹⁶ Section 508 of the Rehabilitation Act of 1973 was amended by 29 U.S.C. § 794d, Electronic and Information Technology (2018); Information and Communication Technology Standards and Guidelines, 36 C.F.R. Part 1194 (2017). The guidelines require that all web and nonweb content and software for Section 508-covered information and communication technology—including websites, intranets, PDF documents, and systems—conform to Web Content Accessibility Guidelines 2.0, a globally recognized and technologically neutral set of accessibility guidelines for web content.

¹⁷ Department of Veterans Affairs Website Accessibility Act of 2019, Pub. L. No. 116-213, 134 Stat. 1024 (2020); Rehabilitation Act of 1973, Pub. L. No. 93-112, 87 Stat. 355 (1973) § 508. Section 508 of the Rehabilitation Act of 1973 was amended by 29 U.S.C. § 794d.

¹⁸ VA, *VA Website Accessibility Act of 2019, Report on the Accessibility of Websites of the Department of Veterans Affairs to Individuals with Disabilities*, September 29, 2021.

¹⁹ Sens. Bob Casey et al., letter to VA Sec. Denis McDonough, June 6, 2022. The two House Veterans’ Affairs subcommittees were (1) Disability Assistance and Memorial Affairs and (2) Technology and Modernization.

provide an explanation of how it would prioritize noncompliant websites or plans for sustained involvement from stakeholders with different disabilities. VA has a legal obligation to ensure its information and systems are available to all who would benefit, which requires comparable access for people with disabilities. The VA Office of Inspector General (OIG) conducted this audit after members of Congress and a veterans service organization reported concerns about the accessibility of VA websites and information systems for people with disabilities.²⁰

VA Roles and Responsibilities for Section 508 Compliance

According to VA policy, each administration or staff office is responsible for ensuring the information and communications technologies they develop, use, maintain, or procure are accessible to all people with disabilities.²¹ VA's chief information officer is responsible under the policy to ensure those requirements are met through planning, evaluation, and review of projects, education and awareness initiatives, and legislation related to the implementation of projects. The chief information officer established a Section 508 Office within the Office of Information and Technology (OIT) to implement technical standards including

- measuring and tracking how information and communications technologies fit current standards and reporting findings to upper management and other stakeholders;
- providing VA with recommendations, support, and training for Section 508 requirements;
- developing, reviewing, and coordinating accessibility guidance with all VA administrations and staff offices; and
- conducting intranet and internet audits continuously across the enterprise to include related technologies, applications, websites, PDFs, videos, nonweb electronic content, word-processing documents, Microsoft PowerPoint and Excel documents, and SharePoint.²²

VA policy requires that under secretaries, assistant secretaries, and other key officials, with assistance from the chief information officer, ensure that all systems and applications developed, procured, and maintained or used by VA have been analyzed, tested, and evaluated in

²⁰ The veterans service organization was the Blinded Veterans Association, which is dedicated to assisting veterans with sight loss and their families. The association reported to the OIG the association's concerns about lack of accessibility to VA systems.

²¹ VA Directive 6221, *Accessible Information and Communications Technology*, October 16, 2017; VA Handbook 6221, *Accessible Information and Communication Technology*, February 13, 2019.

²² VA Directive 6221; VA Handbook 6221.

coordination with its Section 508 Office for compliance with the law. All requests for legally defined exceptions must be submitted to the Section 508 Office for review and approval.

VA policy also establishes minimum internet and intranet service procedures, as well as guidelines.²³ Under secretaries, assistant secretaries, and other key officials must ensure the implementation of VA internet and intranet service policies within their respective administrations and staff offices. According to the policy, VA internet and intranet services must be designed to support the widest range of potential users and computing platforms and comply with Section 508. Individual program offices or facility sites with web assets are responsible for complying with the law. VA established the Web Governance Board as the final authority on all web-related content outlined in its policies and created web communication offices to enforce web policies.²⁴

VA Web Registry

VA's Web Registry is an online system to track its internet and intranet websites and certify them to help ensure the accuracy of information entered annually for the Veterans Health Administration (VHA), Veterans Benefits Administration (VBA), National Cemetery Administration (NCA), and VA Central Office.²⁵ Web managers also have the ability to self-certify Section 508 compliance for each site on the registry. The registry allows users to track progress on tasks such as deploying new sites and updates, certification status related to 508 compliance, and required privacy and content reviews. Users can see reports related to the sites and easily find website contacts. Users can also search for their respective websites and view the number of sites on the registry. VA Directive 6102 and its accompanying handbook require web managers to maintain and certify the accuracy of Web Registry entries annually or as changes occur for each asset with an assigned uniform resource locator (URL) on the "va.gov"

²³ VA Directive 6102, *Internet and Intranet Services*, August 5, 2019; VA Handbook 6102, *Internet and Intranet Services*, August 5, 2019.

²⁴ VA Handbook 6102. The Web Governance Board includes designated representatives from administrations and key staff offices across VA. The board serves as the principal entity that acts on the Secretary's behalf with respect to VA web policy, procedures, and guidance. Web communications offices refer to the offices and individuals responsible for enforcing internet and intranet web communication compliance with policy.

²⁵ The Web Registry includes fields such as location, site name, registration type, organization, content point of contact, purpose, and 508-compliant status.

domain and other domains that have received permission to operate on VA's behalf or with its funding.²⁶

VA Directive 6102 and its accompanying handbook also require web managers to be knowledgeable about VA communications and public affairs policies, procedures, and organizational messages. These managers are accountable for the content of their websites. Managers must ensure all content is “current, accurate, factual, relevant to the VA or program office mission, spell-checked, grammatically correct, and compliant with Section 508.”²⁷ In addition, managers must be knowledgeable about the technical issues regarding the maintenance or management of the internet or intranet asset, such as branding, navigation, page formats, graphics, and other attributes that provide the desired framework and corporate appearance.

VA Systems Inventory

While the Web Registry tracks the number of websites within each administration and the VA Central Office, the VA Systems Inventory is the authoritative data source for VA information technology systems. For example, the inventory includes My HealthVet and the Integrated Financial Acquisition Management System.²⁸ It is a department-wide inventory of systems and related information that reflects the current state of VA's information environment and enables analysis and decision support across a wide variety of topics. To be registered as a system, an information technology capability must exhibit at least one of the following characteristics:

- It automates or supports the automation of a VA business process.
- It is funded by VA or any other government entity in support of VA, either by investment or fee for use.
- It is hosted in a shared computing environment, such as a data center, government or commercial cloud facility, or medical center.
- It uses personal identity verification, password, or other multifactor authentication methods to access the system's data, services, and other capabilities.

²⁶ VA Directive 6102; VA Handbook 6102. Assets are defined as websites, web-based applications, web-based services, and other applications that use web technologies and have a VA-designed or -managed publicly available client interface such as a mobile app or web-based application. A URL is a reference to a web resource that specifies its location on a computer network and a mechanism for retrieving it. A typical URL could have the form <http://www.example.com/index.html>, which indicates a protocol (http), a host name (www.example.com), and a file name (index.html). URLs are also sometimes referred to as web addresses, https://csrc.nist.gov/glossary/term/uniform_resource_locator.

²⁷ VA Directive 6102, p. 9.

²⁸ VA Directive 6404, *VA Systems Inventory*, February 23, 2016.

- It sends or receives data or interfaces with data to veterans, users, another VA product, or a product outside VA.²⁹

²⁹ *VA Systems Inventory Handbook*, June 17, 2021.

Results and Recommendations

Finding: Despite Some Progress, VA Lacks the Oversight, Controls, and Updated Implementation Guidance Needed to Comply with Section 508 Accessibility and Related Reporting Requirements

Section 508 requires that all information and communications technology be accessible to individuals with disabilities. For VA, this requirement includes veterans, their families, and caregivers, as well as VA employees and contractors, the public, Congress, veterans service organizations, and any other stakeholders who want to access information on VA websites or systems they are permitted to view.

VA is working toward compliance and addressing concerns about the accessibility of its information and communications technology. In June 2022, Congress requested a revised report from VA.³⁰ Although the congressional leaders did not require the revised report by a specific deadline, VA responded on July 29, 2022. VA's stated strategy is to prioritize accessibility compliance for websites that receive the most visits and then to address those with fewer views.³¹ While members of Congress recognized that VA should prioritize website remediation based on relative usage, the members also emphasized the importance of full transparency for congressional oversight and to make taxpayers aware of the full scope of VA's Section 508 compliance.³²

Among the areas where VA could improve, the OIG found that web managers and information system owners did not ensure compliance with Section 508 requirements. Web communications offices also did not consistently enforce the requirement that web managers add and certify all internet and intranet sites in VA's Web Registry. As a result, VA's September 2021 report to Congress did not cover all VA public and internal websites as required, including over 218,000 sites on SharePoint Online, an application used to create internal intranet websites for personnel.³³

Some VA information technology systems were also found not to have been assessed for compliance with Section 508 requirements.³⁴ In addition, there were Section 508 designations in the VA Systems Inventory that were inaccurate because administrations and staff offices did not

³⁰ Sens. Bob Casey et al., letter to VA Sec. Denis McDonough, June 6, 2022.

³¹ VA Sec. Denis McDonough, letter to Sen. Robert P. Casey Jr., July 29, 2022.

³² Sens. Bob Casey et al., letter to VA Sec. Denis McDonough, October 7, 2022.

³³ VA, *VA Website Accessibility Act of 2019, Report on the Accessibility of Websites of the Department of Veterans Affairs to Individuals with Disabilities*, September 29, 2021; SharePoint Online is a cloud-based service, hosted by Microsoft, for the creation of limited-access intranet websites, <https://answers.microsoft.com/en-us/msoffice/forum/all/sharepoint-online-vs-sharepoint-2019/2a45c311-8747-434b-bb89-57c452d384f7>.

³⁴ For more information on the systems assessed for compliance, see appendix A.

update or validate them as directed.³⁵ This occurred in part because VA officials did not ensure all managers were aware of policy and procedures found in VA Directive 6221 and its accompanying handbook.³⁶

From October 2021 to December 2022, the VA Section 508 Office did not have a scanning tool to track website compliance. The need for such a tool had been unaddressed because the VA contract for website-scanning services ended in November 2021. A new contract was awarded in July 2022, but a bid protest of the award was not resolved until December 2022.³⁷ Since February 2023, a contractor has been conducting limited scans of VA's public-facing websites because the tool has not received an authority to operate.³⁸ However, according to VA Section 508 Office managers, the office had full scanning and reporting functionality for internet websites as of August 2023 and expected it for intranet websites and SharePoint sites in October 2023. Further, the managers indicated the scanning tool would be available to about 400 VA employees from various administrations, allowing them to conduct website scans and correct identified deficiencies.

The OIG also determined that VA had three outdated directives related to accessibility, systems management, and web-based collaboration technologies.³⁹ These directives had not been updated in accordance with VA's enterprise directives management procedures, which require that all permanent directives and handbooks be recertified within five years of issuance to ensure consistency with other enterprise directives and handbooks.⁴⁰ Until VA addresses all compliance issues, the information access provided to individuals with disabilities may not be comparable to the access provided to those without disabilities.

The following determinations formed the basis for the finding and prompted the OIG's recommendations. VA did not

- effectively manage website accessibility to ensure Section 508 compliance,
- ensure all information technology systems met accessibility requirements or that accessibility designations in the systems inventory were accurate, or

³⁵ VA Directive 6404, *VA Systems Inventory*. VA Systems Inventory designates systems as Section 508 compliant, noncompliant, or unassessed.

³⁶ VA Handbook 6221. VA officials include under secretaries, assistant secretaries, and other key officials.

³⁷ A bid protest is a challenge to the award or proposed award of a contract for the procurement of goods and services or a challenge to the terms of a solicitation for such a contract, <https://www.gao.gov/legal/bid-protests/faqs>.

³⁸ Authority to operate is a formal declaration by a designated approving authority that authorizes operation of a business product and explicitly accepts the risk to the agency. The authority to operate is signed after a certification agent confirms that the system has passed all requirements to become operational.

³⁹ VA Directive 6221; VA Directive 6404; VA Directive 6515, *Use of Web-Based Collaboration Technologies*, June 28, 2011.

⁴⁰ VA Handbook 0999, *Enterprise Directives Management Procedures*, August 1, 2019.

- update relevant directives that guide compliance.

What the OIG Did

The audit team reviewed Section 508 requirements and VA policies and procedures to assess whether VA has taken sufficient actions to comply with information and communications technology accessibility requirements related to its relevant information technology systems and websites. Specifically, the team reviewed whether VA was complying with its own guidance and acting as needed to ensure websites and information technology systems were accessible to individuals with disabilities. This was done by

- reviewing the Website Accessibility Act to determine if VA identified and conducted a study on all its websites consistent with the act's requirements;
- assessing VA's Web Registry to help establish whether staff procedures assured its overall accuracy and whether websites were certified annually;
- interviewing representatives from the Web Governance Board and OIT to determine if VA had a comprehensive listing of all its internet, intranet, and SharePoint sites;
- interviewing VA's Section 508 Office chief, director, and information specialist and VA system owners to ascertain whether the system inventory had the correct Section 508 designations; and
- completing a review of 40 systems from an OIG statistical sample that included compliant, noncompliant, and unassessed records with supporting documentation for those systems as available.

The team did not independently verify compliance with Section 508 standards. It examined self-reporting by VA on website and system compliance to assess progress and deficiencies. Further discussion of the scope and methodology of this audit can be found in appendix A.

VA Did Not Effectively Manage Website Accessibility to Ensure Compliance

The Website Accessibility Act required VA to study all its websites to determine if they are accessible to individuals with disabilities and report the results to the House and Senate Committees on Veterans' Affairs. The September 2021 report to Congress indicated 41 of 462 internet sites (9 percent) and 22 of 350 intranet sites (6 percent) were fully compliant with Section 508. In a July 2022 letter to Congress, VA said its remediation strategy focused on the top 1,000 web pages that receive the most visits; the majority of the page views were associated with <https://www.VA.gov> and <https://www.myhealth.va.gov>. According to VA, as of January 2023, about 54 percent of its web pages and documents that have an administration assigned were compliant with Section 508 requirements (674 of 1,254). The January update was

based on data from Google Analytics about the frequency of visits for web pages and documents assigned to administrations.

However, that update did not address accessibility requirements compliance for all websites, such as less frequently visited web resources and intranet sites. In July 2023, an information technology specialist from the Section 508 Office informed the OIG that the office implemented a grading system for its audits and improved the audit process by updating procedures and clarifying assigned roles and responsibilities. In addition, the Section 508 Office manager stated accessibility training had been provided to about 650 VA employees on topics such as how to make websites, PDFs, and other documents 508 compliant.

The OIG acknowledges VA's ongoing efforts to address compliance concerns about the accessibility of its information and communications technology by prioritizing websites that receive the most visits before addressing those with fewer views. However, the OIG found VA could improve its efforts in several areas. For example, web managers and web communications offices did not routinely follow or enforce VA policies for development and management of websites to ensure they comply with the law.⁴¹ Also, the Section 508 Office was not consistently tracking websites for compliance.⁴² By not effectively managing website accessibility as required by Section 508 and VA policy, VA cannot guarantee that individuals with disabilities have access to data comparable to that of individuals without disabilities.

A Significant Number of Websites Were Missing from or Not Updated on the Web Registry as Required by VA Policy

Web managers are required by VA policy to maintain an accurate registry of all websites and certify entries annually.⁴³ Specifically, web managers should ensure each website with a URL on the "va.gov" domain or other domains permitted to operate on VA's behalf or with VA funding is recorded and certified on the Web Registry (VA's official repository of websites).⁴⁴ However, OIT staff stated that the Web Registry has not been maintained over time, contained inaccurate and incomplete information, and did not include all required URLs. OIT provided the audit team with several listings of websites from various sources. However, OIT informed the team that the various sources did not represent a complete listing of all VA websites. The sources included 224,719 websites, of which 1,262 were from the Web Registry as of October 2022. The

⁴¹ VA Handbook 6102, *Internet and Intranet Services*, August 5, 2019.

⁴² VA Directive 6221.

⁴³ VA Directive 6102; VA Handbook 6102.

⁴⁴ The Web Registry includes the following fields: status, URL, location, site name, registration type, organization, content point of contact, purpose, 508-compliant status, privacy statement on website, created on, created by, and modified on. This information must be certified as accurate annually or as changes occur.

remaining 223,457 included 218,260 SharePoint Online internal sites and 5,197 websites that were not included on the registry, though VA had identified them.

In May 2023, the registry had 2,435 active websites (1,010 internet and 1,425 intranet). Of these entries, 1,193 were not certified and 1,084 were not certified within the past year; therefore, 2,277 of entries (94 percent) in the registry did not meet the annual certification requirements. Without a central repository, VA could not effectively manage and monitor accessibility for all its websites. VA policy requires web communications offices to communicate and enforce web policy and other supplemental guidance for internet and intranet websites and ensure needed corrective actions are taken.⁴⁵ This includes requiring web managers to enter information into the registry. The OIG found web communications offices across VA did not enforce the requirement that web managers add site information and certify each entry.⁴⁶ According to the Web Registry project manager, ensuring that the registry is updated has been a challenge, and enforcement has always been a problem.

A VHA web communications office representative stated that web managers most likely do not understand what the registry is used for or that there is a requirement for them to manually update it. The representative also said the office does not enforce policy for Section 508-compliant content updates by web managers and explained that websites are owned by either the network directors or chief officers who are responsible for them. In addition, the representative indicated web managers are not in the office's chain of command and it has no authority over them. Further, the representative said the office would only exercise authority over website content in cases of egregious misinformation, and Section 508 deficiencies do not fall in that category.

According to multiple web communication office representatives, the web manager position is a collateral duty for individuals and there is a great deal of variability in skill and knowledge in creating and managing web content. In addition, the representatives indicated noncompliant PDF documents are a major reason why websites do not meet the law's requirements. The representatives indicated employees developing web content do not understand the Section 508 requirements or their importance. Further, they said employees struggle with resolving Section 508 compliance defects, particularly those associated with PDFs.

A representative from the VBA web communications office indicated that staff focus only on core benefits sites, and most of the websites in the registry were out of the office's purview. A representative from the NCA web communications office who is also the acting web manager stated the office registered and certified only four URLs and does not oversee maintenance and certification of Web Registry entries. However, in January 2023, the NCA had over 600 PDF documents that were not compliant. According to the representative, the deficiencies were

⁴⁵ VA Directive 6102; VA Handbook 6102.

⁴⁶ VA Directive 6102; VA Handbook 6102.

related to maps, tables, and documents with complex features that were beyond employees' skill level and ability to remediate. A representative from the VA Central Office web communications office said time constraints and competing priorities resulted in not enforcing policies for the recording of entries in the Web Registry and annual certification by web managers. This representative also said responsibilities are distributed internally among offices, and that the central office did not consistently enforce VA policy or perform periodic reviews of their websites' compliance. In addition, another representative said the central office relied on Section 508 scans of websites.

Though VA policy requires the Web Governance Board to monitor registry certifications, the board's secretary said it does not perform this function because it was delegated to VA administrations' web communications offices.⁴⁷ The VA Central Office web communications office also did not monitor registry certifications. VHA and NCA web communications office representatives said they did not recall this responsibility being delegated to their offices. As a result, VA could not identify all its websites and accurately report to Congress whether they were accessible to individuals with disabilities, as required by the Website Accessibility Act. A majority of the representatives said their offices do not oversee Section 508 compliance of internal SharePoint sites due to lack of permission to access those sites.

The Section 508 Office Did Not Consistently Track Whether VA Websites Were Compliant

The Section 508 Office is tasked with tracking compliance with the law and reporting findings to VA leaders and other stakeholders.⁴⁸ The office maintains a dashboard with accessibility information on its internet and intranet websites and web pages based on contractor scans. The dashboard showed VA's Section 508 compliance percentages have been consistently low. The dashboard also includes listings of individual defect types such as colors and PDFs that resulted in the websites being noncompliant.⁴⁹ The defect types reflect errors contained within each scan related to internet and intranet websites. The data in the scans are based on a sampling of Section 508 defects found in individual products and do not represent all Section 508 defects present. The team focused on color and PDFs as examples, but there were 16 individual defect types. For example, for January 2021, there were 456 website scans resulting in 229,662 internet web defects for PDFs alone.

⁴⁷ VA Directive 6102; VA Handbook 6102.

⁴⁸ VA Handbook 6221.

⁴⁹ An accessible document uses color as a design choice rather than the sole way of conveying information in a graphic or table; PDFs must also be compatible with screen readers or speech-to-text tools. Color is an important asset in the design of web content, enhancing its aesthetic appeal, usability, and accessibility. Concerning PDFs, if these documents are not Section 508 compliant, persons with disabilities who use assistive technology, such as screen readers or speech-to-text tools, may find it difficult or impossible to access critical information.

Figures 1 through 4 show the compliance percentage and number of selected defect types for VA internet and intranet websites that reflect contractor scan results obtained in January 2023.

Internet Sites—Percentage Noncompliant and Number of Defects

Based on VA’s own data from contractor scans for the dashboard on gauging public-facing website compliance with Section 508, between May 2019 and May 2022, the percentage of compliant internet websites ranged from 5 percent to 11 percent.

2019						2020						2021					2022	
May	Jun	Jul	Aug	Sep	Nov	Jan	Mar	May	Jul	Sep	Nov	Jan	Mar	May	Jul	Sep	Nov	May
7	7	7	7	8	8	8	8	8	8	8	8	8	8	8	10	11	5	8

Percentage

Figure 1. Percentage of compliant internet websites.
 Source: OIG analysis of VA’s internet web compliance data.
 Note: The data do not include internal VA SharePoint websites.

Based on VA’s own data from contractor scans on the dashboard on gauging public-facing website compliance with Section 508, between May 2019 and May 2022, among the most frequently found defects impeding Section 508 were PDF and color defects. For PDFs, these numbers ranged from 5,000 to 258,000. For color, these numbers ranged from 4,000 to 759,000.

Defect Type	2019						2020						2021					2022	
	May	Jun	Jul	Aug	Sep	Nov	Jan	Mar	May	Jul	Sep	Nov	Jan	Mar	May	Jul	Sep	Nov	May
PDF	258	254	249	179	235	229	227	204	211	218	214	223	230	222	190	204	188	5	211
Color	114	126	128	82	85	85	165	637	621	693	723	759	757	21	13	19	17	4	16

Number in thousands

Figure 2. Number of VA-identified internet (public-facing) web defects.
 Source: OIG analysis of VA’s internet web defect data.
 Note: The data do not include internal VA SharePoint websites.

Intranet Sites—Percentage Noncompliant and Number of Defects

Based on VA’s own data from contractor scans for website compliance with Section 508, between May 2019 and May 2022, the percentage of compliant intranet websites ranged from less than 1 percent to 9 percent.

2019		2020						2021				2022	
Oct	Dec	Feb	Apr	Jun	Aug	Oct	Dec	Feb	Apr	Jun	Aug	Oct	Jun
2	2	1	1	.4	.7	2	3	8	7	8	9	8	6

Percentage

Figure 3. Percentage of intranet-compliant websites.

Source: OIG analysis of VA’s intranet web compliance data.

Note: The data do not include public-facing VA websites.

Based on VA’s own data from contractor scans for website compliance with Section 508 for its intranet sites, between October 2019 and June 2022, some of the most frequently found defects impeding Section 508 included PDF and color defects. For PDFs, these numbers ranged from 107,000 to 730,000. For color, these numbers ranged from 443,000 to 1,000,000.

Defect Type	2019		2020						2021				2022	
	Oct	Dec	Feb	Apr	Jun	Aug	Oct	Dec	Feb	Apr	Jun	Aug	Oct	Jun
PDF	107	113	112	113	118	150	163	172	155	167	169	730	166	168
Color	665	589	557	463	485	454	443	572	534	514	455	1,000	456	616

Number in thousands

Figure 4. Number and type of intranet website defects.

Source: VA OIG analysis of intranet web defect data.

Note: The data do not include public-facing VA websites.

The OIG found, however, that the Section 508 Office data reflected in figures 1 through 4 for VA were incomplete because of a lapse in contracted website-scanning services. The office was also not tracking websites that require passwords or authentication (more than 218,000 internal SharePoint sites). The office typically uses contracted website-scanning services to track compliance with accessibility requirements, but this sort of scan had not been done since the latest contract lapsed in November 2021. As stated earlier, a new contract was awarded in July 2022, but the bid protest of the contract award was not resolved until December 2022. A Section 508 Office manager said the office was setting up the capability for conducting

internal-facing intranet scans, to include SharePoint sites, to be completed by October 2023. The office managers further stated about 3,200 of the SharePoint Online sites (less than 2 percent) are unrestricted and will be included as an additional scanning source.

The Section 508 Office manager also said the office planned to start internet scans in August 2023. Starting in February 2023, a contractor was conducting some scans of VA's public-facing websites, but the scans were limited because the tool had not received an authority to operate.⁵⁰ Further, the manager indicated the Section 508 Office will configure and customize its scanning tool to report website deficiencies and provide that information to responsible VA administrations and staff offices.

For the contract that ended in November 2021, the contractor used the VA Web Operations Web Catalog as the source for its internet and intranet website scans.⁵¹ According to an OIT senior information technology specialist, the catalog is a subset of websites contained on the Web Registry. Section 508 Office managers also indicated the contractor used the catalog instead of the Web Registry because it was considered more reliable than the registry, and that the Web Governance Board managed the information. As of May 2023, the catalog contained 812 websites, including 466 internet and 346 intranet websites. As stated earlier, the registry contained 2,435 active websites, representing 1,010 internet and 1,425 intranet websites also at that time. However, even the Web Registry is missing a significant number of websites subject to review for Section 508 compliance.

Although VA needs a complete listing of websites to determine compliance with Section 508, OIT was unable to provide the audit team with one. According to Section 508 Office managers, the office has not reviewed websites that require passwords or authentication, such as internal SharePoint sites.⁵² The managers also stated they expect noncompliant documents would result in low compliance numbers for SharePoint sites. The managers further indicated the sources for the new contractor's website scans will be the VA Web Operations Web Catalog, Google Analytics data, and websites of interest identified by the Blinded Veterans Association and a

⁵⁰ Authority to operate is a formal declaration by a designated approving authority that authorizes operation of a business product and explicitly accepts the risk to the agency. The authority to operate is signed after a certification agent confirms that the system has passed all requirements to become operational.

⁵¹ Web Operations is an organization that provides website and enterprise-based application hosting services for all VA facilities and programs. While websites are hosted at most data centers, Web Operations is responsible for websites hosted at the Capital Region Readiness Center in Martinsburg, West Virginia, the Philadelphia Information Technology Center in Philadelphia, Pennsylvania, and the Web Operations Azure Cloud subscription.

⁵² Organizations use Microsoft SharePoint to create websites. It can be used to store, organize, share, and access information from any device. <https://support.microsoft.com/en-gb/office/what-is-sharepoint-97b915e6-651b-43b2-827d-fb25777f446f>.

member of Congress.⁵³ These sources would use more expansive data sources for a more comprehensive inventory.

As indicated previously in this report, VA policy requires the use of the Web Registry. By using the VA Web Operations Web Catalog as the source for its scans, the Section 508 Office is not tracking all websites, as neither the catalog nor the registry contained all VA websites. VA recognizes all its websites are not fully compliant with Section 508 and the information access provided to individuals with disabilities may not be comparable to the access provided to those without disabilities. However, if staff continue not following policy, VA’s strategy for remediating the problem will be hampered.

VA Did Not Ensure Its Information Technology Systems Met Accessibility Requirements or Were Designated Accurately

To evaluate whether VA was following processes and procedures to make certain that information technology systems complied with federal and VA accessibility requirements, the audit team selected a statistical sample in October 2022 of 40 systems from VA’s inventory of 923 systems.⁵⁴ According to the inventory designations, 10 of those systems were listed as Section 508 compliant, 10 were noncompliant, and 20 were unassessed. However, the team determined that 13 had incorrect designations recorded in the inventory when compared with the certifications on file with the Section 508 Office. Table 1 shows the Section 508 designations for the sampled systems.

Table 1. VA Inventory Designations of Sampled Systems

Inventory designation	Number of systems reported	Number of inaccurate designations	If a designation was inaccurate, what was the correct designation?
Compliant	10	4	3 noncompliant, 1 unassessed
Noncompliant	10	4	2 compliant, 2 unassessed
Unassessed	20	5	4 noncompliant, 1 compliant
Total	40	13	3 compliant, 7 noncompliant, 3 unassessed

Source: *OIG analysis of systems’ Section 508 compliance.*

The inaccurate Section 508 designations resulted from VA administrations and staff offices not ensuring inventory information was updated or validated. VA policy requires administrations and

⁵³ Google Analytics is a platform that collects data from websites and applications to create reports that provide insights into businesses. “How Google Analytics Works” (web page), Google, accessed February 22, 2023, <https://support.google.com/analytics/answer/12159447?hl=en#:~:text=Google%20Analytics%20is%20a%20platform,provide%20insights%20into%20your%20business>. According to its website, Blinded Veterans Association is a congressionally chartered service organization created for, consisting of, and led by visually impaired veterans.

⁵⁴ VA Systems Inventory designates systems as Section 508 compliant, noncompliant, or unassessed. For details on the sampling methodology, see appendix A.

staff offices to ensure the system inventory information is updated or validated during VA information technology system reviews.⁵⁵ According to several system owners, they were not aware the information needed to be updated or that it was their responsibility. VA policy says the systems inventory is “necessary to manage current capabilities, prevent duplicative development efforts, and facilitate future planning resulting in efficient and effective use of VA resources to deliver an integrated and interoperable information environment.”⁵⁶ Without accurate information, VA cannot adequately assess information technology system compliance with the law or achieve the stated objective of the VA policy.

The OIG also found after reviewing applicable audit reports and certifications that the Section 508 Office had certified nine systems as compliant with legal requirements but also determined 13 were noncompliant. The remaining 18 had not been assessed by the Section 508 Office because system owners had not requested an audit as required. System owners’ feedback suggested the 18 systems were unassessed primarily because VA officials did not ensure all managers were aware of the contents of VA Directive 6221 and its accompanying handbook, which states they are required to ensure all systems and applications have been evaluated in coordination with the Section 508 Office for compliance.⁵⁷ The system owners further stated they had not requested Section 508 audits for the 18 unassessed systems because two were being decommissioned, three did not have a user interface, one was merged with another system, and one was under development. While VA policy allows the Section 508 Office to grant exemptions, none were requested for the unassessed systems. For the remaining 11, the system owners were unaware of accessibility requirements. By not ensuring systems are compliant with Section 508, VA cannot guarantee that individuals with disabilities have access to data comparable to that of individuals without disabilities.

VA Did Not Update Relevant Policies

VA policies related to accessibility, management of systems, and the use of web-based collaboration technologies were not updated. VA’s management procedures for enterprise directives require that permanent directives and handbooks be recertified within five years of issuance to ensure current policy and procedures are consistent with other enterprise directives and handbooks.⁵⁸ None of the three most relevant VA directives had been recertified within the mandated timeline.⁵⁹

⁵⁵ VA Directive 6404.

⁵⁶ VA Directive 6404.

⁵⁷ VA Handbook 6221. VA officials include under secretaries, assistant secretaries, and other key officials. The Section 508 Office refers to the required evaluations as “audits.”

⁵⁸ VA Handbook 0999.

⁵⁹ VA Directive 6221; VA Directive 6404; and VA Directive 6515, *Use of Web-Based Collaboration Technologies*.

VA Directive 6221 establishes access and use guidelines for information and communications technology in compliance with Section 508. This policy had not been updated since October 16, 2017. According to a Section 508 Office manager, no significant changes were identified during annual reviews of the policy, but this does not exempt it from recertification.

VA Directive 6404 designates the VA Systems Inventory as the authoritative data source for information technology systems. This policy had not been updated since February 23, 2016. According to a senior architect for the Architecture and Engineering Service, the directive was updated and sent to the Office of Enterprise Integration for concurrence and approval. The senior architect also indicated the directive has been with the Office of Enterprise Integration since June 2022 with no indication as to why it has not been approved. However, according to a support lead for the Digital Experience Program Management Office, the Office of the Chief Technology Officer obtained what it needed from the Office of Enterprise Integration to move this directive update forward.

VA Directive 6515 sets policy for use of web-based resources and tools to facilitate collaboration, outreach, communication, and information sharing at VA. These web-based collaborative tools include blogs, web feeds, and forums such as Facebook, and collaborative tools such as Microsoft SharePoint. This policy had not been updated since June 28, 2011. The director for VA digital media engagement told the OIG that he was not aware of VA's enterprise directives management procedures. However, the director for VA digital media engagement indicated his office has been working on updating this directive since 2021. He said the office submitted the directive to VA's Office of General Counsel for concurrence on a protected speech issue, causing its approval to stall. The director said it would be resubmitted for approval in 2023.

VA needs to ensure it does not risk following outdated policies and procedures that may fail to comply with new laws and regulations. Policies that remain outdated for many years may affect staff awareness of requirements and the delivery of accessible information and communications technology to individuals with disabilities.

Conclusion

Section 508 is intended to ensure that individuals with disabilities have access to information and data comparable to that of individuals without disabilities. VA's efforts to comply with the law's requirements are hampered by the lack of a single comprehensive and accurate tracking system, oversight and controls for ensuring required actions are taken to advance compliance, and knowledge among responsible individuals of updated guidance. Though VA is taking steps to fix the deficiencies preventing full compliance with the law, it can improve those efforts by ensuring it has accurate information for managing its websites, updating its policies, ensuring managers and staff understand them, and enforcing compliance.

Recommendations 1–6

The OIG made six recommendations, with five directed to the assistant secretary for information and technology and chief information officer to conduct the following actions:

1. Develop and implement a strategy with milestones for identifying all VA websites, confirm their inclusion in VA’s Web Registry as the current system designated by policy, and certify the accuracy of entries annually or as changes occur.
2. Establish a mechanism for web communication offices across VA to enforce the implementation of VA Handbook 6102 related to Section 508 compliance.
3. Coordinate with VA under secretaries and other assistant secretaries to ensure system owners are educated on VA Directive 6221 and its accompanying handbook requirements to request accessibility audits.
4. Institute a mechanism to ensure information technology system accessibility designations are accurate in the VA Systems Inventory.
5. Update, recertify, and republish VA Directives 6221 (accessible information and communications technology) and 6404 (systems inventory).

The OIG also made the following recommendation to the assistant secretary for public and intergovernmental affairs:

6. Update, recertify, and publish VA Directive 6515 (use of web-based collaboration technologies).

VA Management Comments

The assistant secretary for information and technology and chief information officer, in coordination with the Office of Public and Intergovernmental Affairs, concurred with recommendations 1 through 6 and provided action plans for all recommendations. The actions proposed by OIT are detailed in appendix B.

In response to recommendations 1 and 2, the assistant secretary stated the VA Section 508 Compliance Office will work through the Web Governance Board to ensure the Web Registry is accurate and its use enforced, and will implement VA Handbook 6102 across VA. The target completion date is September 30, 2025.

For recommendation 3, the assistant secretary indicated the VA Section 508 Compliance Office will host a required virtual training course for all information and communications technology system owners. The target completion date is December 31, 2024. In response to recommendation 4, the assistant secretary stated the VA Section 508 Compliance Office will work with the Enterprise Architecture organization to restrict the Section 508 compliance status field so only the compliance office can change or update it. The target completion date is

September 30, 2025. For recommendation 5, the assistant secretary said the VA Section 508 Compliance Office will work with the Enterprise Architecture organization to review and update VA Directive 6404 and its accompanying handbook. The target completion date is March 31, 2025.

Finally, in response to recommendation 6, the assistant secretary stated the Office of Public and Intergovernmental Affairs is currently in the process of creating Directive 8502, *Use of Social Media*, which states VA must comply with applicable federal laws, regulations, and requirements including Section 508 of the Rehabilitation Act of 1973 as amended in 1998, privacy, ethics, copyright, information security, and records management in its social media use. The assistant secretary also indicated the Web Governance Board will update VA Directive 6515 and remove the web guidance content that is already covered under VA Directive 6102. Further, the assistant secretary indicated the revised table VA Directive 6515 will be an OIT directive focused on enterprise software and hardware guidance. The target completion date is September 30, 2025.

OIG Response

The assistant secretary's corrective action plans for recommendations 1 through 6 are generally responsive to the intent of the recommendations. However, while the assistant secretary concurred with recommendation 1, he did not specifically mention a strategy for identifying all VA websites. Also, the assistant secretary concurred with recommendation 5 but did not indicate VA Directive 6221 would be updated, recertified, and republished. Further, while the target completion dates provided for recommendations 1, 2, 4, 5, and 6 are beyond the time usually allotted for implementation, the OIG recognizes the scope of the recommended actions and agrees with the target dates. The OIG will monitor the implementation of all corrective actions by OIT and close the recommendations when sufficient evidence demonstrates progress addressing them. Additionally, the assistant secretary stated in response to recommendation 1 that the OIG report points out the definition of a "website" is ambiguous since every site is simply a subdirectory or subdomain within the va.gov top-level domain. However, the OIG notes the report does not state the definition of a website is ambiguous.

Appendix A: Scope and Methodology

Scope

The audit team performed this audit from October 2022 through September 2023, to assess whether VA has taken sufficient actions to comply with Section 508 information and communications technology accessibility requirements related to its information technology systems and websites. To accomplish the objective, the audit team reviewed a statistical sample of 40 VA systems as of October 11, 2022. Based on accessibility requirements defined in 36 C.F.R. Part 1194 and VA Handbook 6221, the team used statistical sampling to assess the accuracy of VA tracking system designations for compliant, noncompliant, and unassessed systems.

Methodology

To gather information on VA's processes for compliance with accessibility requirements, the audit team interviewed the Section 508 Office, Office of Chief Technology Officer Digital Services Group, Web Registry system owner, VA Web Operations Web Catalog subject matter experts, Web Governance Board members, web communication offices members, SharePoint Governance Board members, and Quality and Risk information technology Governance Committee. The team examined the Code of Federal Regulations, public law, and VA directives and accompanying handbooks to gain an understanding of whether VA actions were sufficient to comply with accessibility requirements. The team also reviewed the Office of Information and Technology's (OIT) documentation related to its implementation, coordination, and management of VA's Section 508 compliance.

To ascertain the total number of VA websites subject to accessibility legal mandates, the VA Office of Inspector General's (OIG) Office of Data Analytics combined data received from several OIT sources and from the October 2022 Web Registry. The audit team also reviewed a statistical sample of 40 systems within VA's inventory to determine their compliance with accessibility requirements. To identify the population of information systems eligible for sampling, the OIG's Office of Data and Analytics pulled, on October 11, 2022, a table of 1,679 systems from the VA Enterprise Architecture Repository. After being filtered by system status, 923 systems remained as being in production or development. For this audit, there was no evidence that any of the 923 systems were out of scope as of that date for those two criteria, or that there were any in-scope systems missing. Consequently, the team accepted the population of 923 systems for this audit. The team also interviewed VA Section 508 Office managers and system owners and reviewed relevant documentation to determine whether Section 508 designations for systems in VA's inventory were accurate.

Internal Controls

The audit team assessed the internal controls of VA's Section 508 program significant to the audit objective. This included an assessment of the five internal control components: control environment, risk assessment, control activities, information and communication, and monitoring.⁶⁰ In addition, the team reviewed the principles of internal controls associated with the objective. The team identified internal control weaknesses in the following relevant three components and three principles and made recommendations to address them:⁶¹

- Component 1: Control Environment
 - Principle 2: Exercises oversight responsibility
- Component 4: Information & Communication
 - Principle 15: Communicates externally
- Component 5: Monitoring Activities
 - Principle 17: Evaluates and communicates deficiencies

Fraud Assessment

The audit team assessed the risk that fraud and noncompliance with provisions of laws, regulations, contracts, and grant agreements, significant in the context of the audit objectives, could occur during this audit. The team exercised due diligence in staying alert to any fraud indicators during its oversight work and did not identify any instances of actual or potential fraud during this audit.

Data Reliability

The audit team obtained electronic spreadsheets of active VA systems that were obtained from VA Enterprise Architecture Repository's inventory data and traced the information on selected sample systems to Enterprise Mission Assurance Support Service system summary reports. The team believes the data from VA's inventory were reliable for the work conducted during this audit. The team also obtained electronic spreadsheets of VA websites from OIT that were not complete. The team believes the data from the electronic spreadsheets were reliable for their intended purposes because they were used only to assess whether websites were logged in the Web Registry as required.

⁶⁰ GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 2014.

⁶¹ Since the review was limited to the internal control components and underlying principles identified, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

Government Standards

The OIG conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that the OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on audit objectives. The OIG believes the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

Appendix B: VA Management Comments

Department of Veterans Affairs Memorandum

Date: October 23, 2023

From: Assistant Secretary for Information and Technology and Chief Information Officer (005)

Subj: Office of Inspector General Draft Report: VA Should Enhance Its Oversight to Improve the Accessibility of Website and Information Technology Systems for Individuals with Disabilities, (Project Number 2022-03909-AE-0166) (VIEWS 10916537)

To: Assistant Inspector General for Audits and Evaluations (52)

1. Thank you for the opportunity to review the Office of Inspector General (OIG) Draft Report, *VA Should Enhance Its Oversight to Improve the Accessibility of Website and Information Technology Systems for Individuals with Disabilities*. (Project Number 2022-03909-AE-0166). We greatly appreciate the dedicated time, analysis, and recommendations to further enhance the 508 Compliance program performed by your office.
2. The Office of Information and Technology (OIT) submits the attached written comments. OIT acknowledges and concurs with the OIG's recommendations and is providing a corrective action plan and target implementation date for each recommendation. OIT leadership holds 508 Compliance as a top priority with a direct link to engineering excellence and delightful customer experiences and we are committed to allocating appropriate resources to meet the requirements of the law for accessible technology.
3. OIT additionally highlights the remarkable strides the Department of Veterans Affairs (VA) has made in significantly improving Section 508 compliance and affirming the Department's commitment to ensuring accessibility for all Veterans since realigning 508 Compliance under Compliance, Risk and Remediation (CRR). One key aspect of this progress is VA's extensive investment in accessible web design, specifically Drupal content management system. We have systematically redesigned our digital interfaces, making websites and applications user-friendly for individuals with disabilities. This proactive approach not only enhances the online experience for Veterans but also ensures that essential services and information are readily accessible to all, regardless of their abilities.
4. Moreover, VA has put a strong focus on accessibility scanning and auditing processes, focusing on the highest priority and most viewed assets first. This involves rigorous assessments and audits of digital content to identify and rectify accessibility issues promptly. By conducting audits and actively addressing any shortcomings, VA demonstrates its dedication to adhering to Section 508 standards, leading to a 93% website compliance rate. This systematic approach not only helps Veterans access crucial online services but also sets a benchmark for other government agencies to follow in pursuit of improved accessibility.
5. Collaboration and partnerships play a pivotal role in VA's accessibility success story. They have joined forces with organizations specializing in accessibility such as Blinded Veterans Association and to gain valuable insights and expertise to further mature the program on behalf of the Nation's Veterans and VA staff. Additionally, involving Veterans with disabilities in the application development process, such as with the VA Health and Benefits app, has ensured that accessibility solutions are tailored to the needs of the very people we aim to serve. This user-centered approach ensures that Veterans' voices are heard and that the VA's services remain truly inclusive. Through these

partnerships and collaborations, the VA has created an environment where Section 508 compliance is not just a requirement but a core value driving innovation and positive change.

The OIG removed point of contact information prior to publication.

(Original signed by)

Kurt D. DelBene

Attachment

Office of Information and Technology
Comments on Office of Inspector General Draft Report,
VA Should Enhance Its Oversight to Improve the Accessibility of Website and
Information Technology Systems for Individuals with Disabilities
(Project Number 2022-03909-AE-0166) (VIEWS 10916537)

Recommendation 1: The OIG recommend the Assistant Secretary for Information and Technology and Chief Information Officer develop and implement a strategy with milestones for identifying all VA websites, confirm their inclusion in VA’s Web Registry as the current system designated by policy, and certify the accuracy of entries annually or as changes occur.

Comments: Concur. The Department of Veterans Affairs (VA) Section 508 Compliance Office will work through the Web Governance Board which has authority under VA Directive 6102, *Internet and Intranet Services* – to enforce the web registry and ensure it is updated and accurately reflects the entries.

As the OIG report points out, the definition of "website" is ambiguous since every site is simply a subdirectory or subdomain within the va.gov top level domain. A more meaningful way to track compliance with section 508, and accessibility more broadly, is to look at traffic to individual pages, sections, or tools within the va.gov ecosystem.

Target Completion Date: September 30, 2025

Recommendation 2: The OIG recommend the Assistant Secretary for Information and Technology and Chief Information Officer establish a mechanism for web communication offices across VA to enforce the implementation of VA Handbook 6102 related to Section 508 compliance.

Comments: Concur. VA Section 508 Compliance Office will work with the Web Governance Board to enforce the implementation of VA Handbook 6102 across the Department through the governance process.

Target Completion Date: September 30, 2025

Recommendation 3: The OIG recommend the Assistant Secretary for Information and Technology and Chief Information Officer coordinate with VA undersecretaries and other assistant secretaries to ensure system owners are educated on VA Directive 6221 and its accompanying handbook requirements to request accessibility audits.

Comments: Concur. VA Section 508 Compliance Office will host a virtual live training course through the Talent Management System (TMS) to review VA Directive 6221, *Accessible Electronic and Information Technology*, requirements. The TMS course will be a requirement for all Information Communication Technology system owners. VA Section 508 Compliance Office outreach engagements will provide additional education.

Target Completion Date: December 31, 2024

Recommendation 4: The OIG recommend the Assistant Secretary for Information and Technology and Chief Information Officer institute a mechanism to ensure information technology system accessibility designations are accurate in the VA Systems Inventory.

Comments: Concur. VA Section 508 Compliance Office will work with the Enterprise Architecture (EA) organization as the VA Systems Inventory (VASI) owner to restrict 508 Compliance status blocks in VASI so that they may only be updated and changed by the VA Section 508 Compliance Office.

Target Completion Date: September 30, 2025

Recommendation 5: The OIG recommend the Assistant Secretary for Information and Technology and Chief Information Officer update, recertify, and republish VA Directives 6221 (accessible information and communications technology) and 6404 (systems inventory).

Comments: Concur. VA Section 508 Compliance Office will work with the EA organization – the owner of VA Directive 6404, *VA Systems Inventory* – to review the handbook and directive. The updated directive and handbook will be drafted by Spring 2024 with final publication in Fall 2024.

Target Completion Date: March 31, 2025

Recommendation 6: The OIG recommend the Assistant Secretary for public and intergovernmental affairs update, recertify, and publish VA Directive 6515 (use of web-based collaboration technologies).

Comments: Concur. OPIA has been working to improve accessibility for all Veterans and agrees that the directives are outdated and need to be republished as soon as possible. A working group decided in 2021 to carve out the social media portion from VA Directive 6515, *Use of Web-Based Collaboration Technologies*, and create VA Directive 8502, *Use of Social Media*, so that it appropriately falls under the Public Affairs series. VA Directive 8502 went through one round of Departmental concurrence in 2022 and was resubmitted for concurrence in 2023. It is currently nearing the end of the concurrence process.

VA Directive 8502 contains the following language:

VA must comply with applicable Federal laws, regulations, and requirements including, but not limited to, Section 508 of the Rehabilitation Act of 1973, as amended in 1998, privacy, ethics, copyright, information security, and records management in its social media use.

When finalized, a working group from the Web Governance Board will update VA Directive 6515. The social media guidance will be removed as will the web guidance content that is already covered under VA Directive 6102. Going forward, the revised VA Directive 6515 will be an OIT directive focused on enterprise software and hardware guidance.

Target Completion Date: September 30, 2025

For accessibility, the original format of this appendix has been modified to comply with Section 508 of the Rehabilitation Act of 1973, as amended.

OIG Contact and Staff Acknowledgments

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