

**2026
DEFENSE HEALTH INFORMATION
TECHNOLOGY SYMPOSIUM**

AUGUST 11-13, 2026
HYATT REGENCY NEW ORLEANS
NEW ORLEANS, LA

Section 508 Requirements and Procurement

Ameenah Ghoston & Michael (Mike) Henry

11 August 2026



UNCLASSIFIED

Speaker Introduction – Ms. Ameenah Ghoston

Ameenah Ghoston, Section 508 Program Manager

Ms. Ghoston functions as the Defense Health Agency (DHA) Section 508 Program Manager and is responsible for developing and implementing Section 508 policy, procedures, training, reporting, and issue tracking in support of acquisition, procurement, software development life-cycle activities and training domains. She has 17 years of experience in accessibility support.



Speaker Introduction – Mr. Mike Henry

Mike Henry, Front End Web Developer

Mike Henry has been a part of SDD's Web & Mobile team for over 20 years. He began the journey of developing for digital accessibility and Section 508 compliance while redesigning Health.mil. Upon announcing the release of the site on social media, someone commented on how the site failed Section 508 compliance requirements. That comment led him to become a certified Trusted Tester for manual testing for Section 508 conformance. He leverages his understanding of web design with both manual and automated testing tools, which has allowed him to shift-left and incorporate digital accessibility and Section 508 conformance requirements into the SDLC process for the DHA's public web.

Agenda

1. General Overview of the Section 508 Law
2. Integrating Section 508 Conformance into Web Development Processes
3. Reporting for Conformance

General Overview of the Section 508 Law

What is Section 508 and How Does it Impact My Program?

Overview

- In 1998, Congress amended the Rehabilitation Act of 1973 to require Federal agencies to make their electronic and information technology (EIT) accessible to people with disabilities.
- Under Section 508, agencies must give disabled employees and members of the public access to information comparable to the access available to others (U.S.C 794D, FAR 39.2, 36CFR 1194.1). That means that any electronic and information technology used, maintained, developed, or procured by DHA must be accessible to persons with disabilities.

Process for Procuring ICT Products and Services

- The Federal Acquisition Regulations (FAR) subpart 39.2 provide a detailed process for purchasing products and services for the Federal government. Work with the Contracting Officer and Section 508 Program Manager assigned to your program.
- Be sure to include Section 508 technical standards when developing requirements (Statement of Objectives, Statement of Work, Performance Work Statement) documents for procurements. The more specific the Section 508 Standards are in the requirements document, the easier it is for the vendor and you to determine if the product or service is Section 508 conformant.
 - Make sure the requirements in the contract are specific to the product or service that is being purchased.
 - Standardized contract language that states the product must be Section 508 conformant is not sufficient.

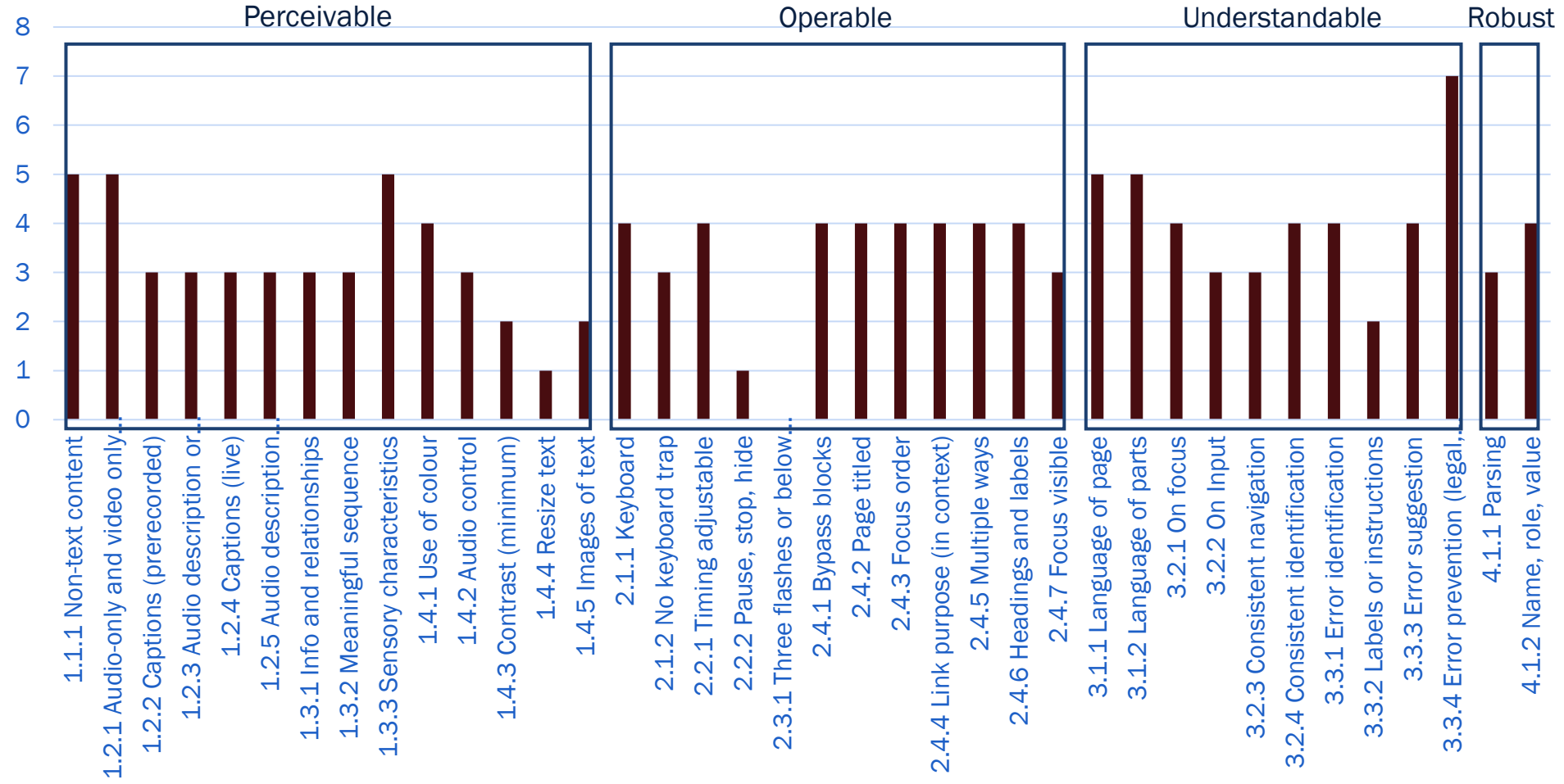


The DHA is committed to making its electronic and information technologies accessible to people with disabilities.

Section 508 & Web Content Accessibility Guidelines (WCAG)

- Section 508 law incorporates by reference the WCAG 2.0 specification, ISO/IEC 40500:2012.
 - WCAG helps ensure online content is available to all regardless of ability.
- WCAG has 3 levels of conformance and complexity.
 - A (lowest), AA, and AAA (highest).
- **A & AA** level is mandatory by law, but AAA should be the goal whenever possible.
- Section 508 minimal requirement **WCAG 2.0 A and AA**
- Additionally, DHA and HHS requires WCAG 2.1 level A and AA conformance.

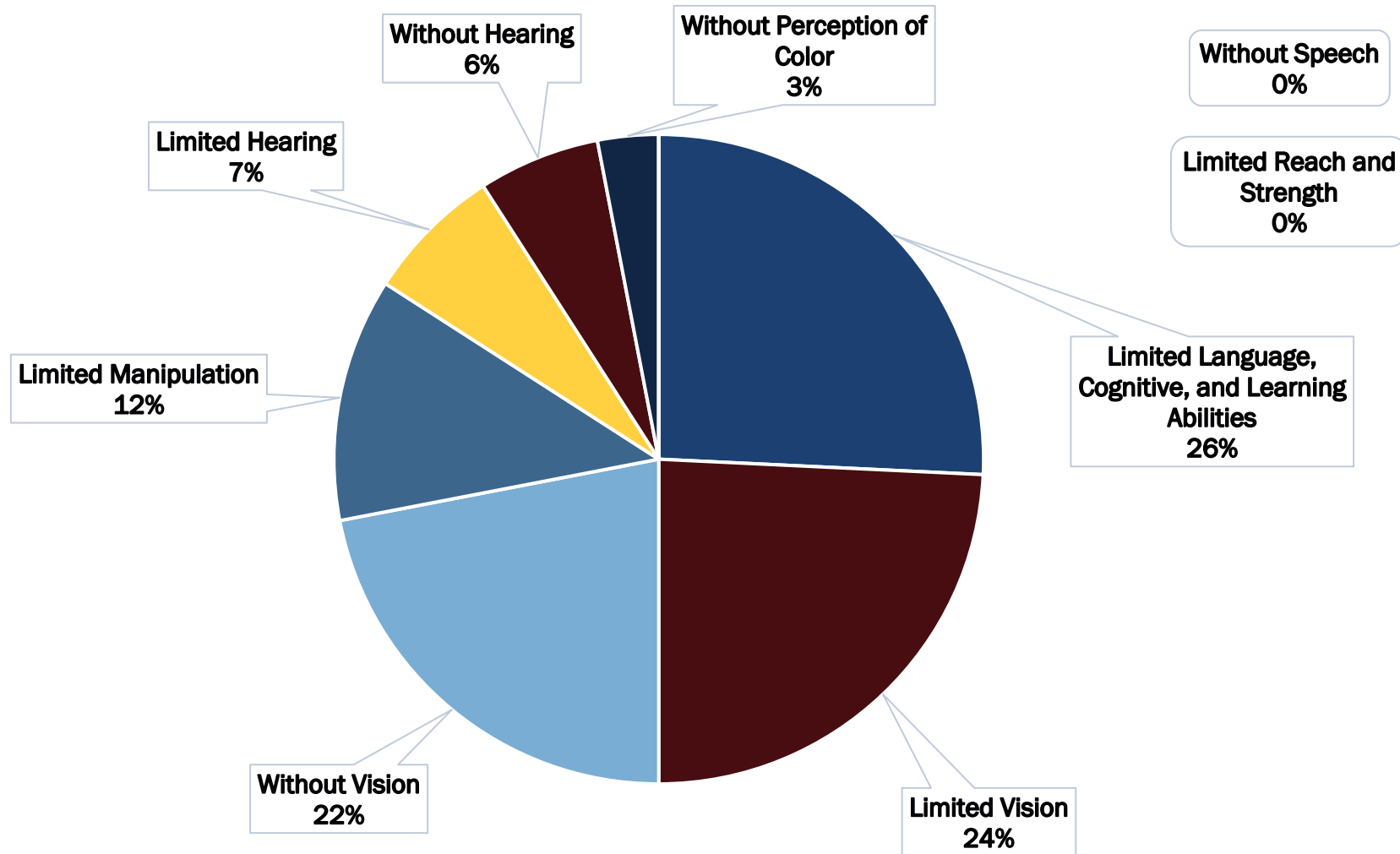
Criteria Count



Understanding Accessibility

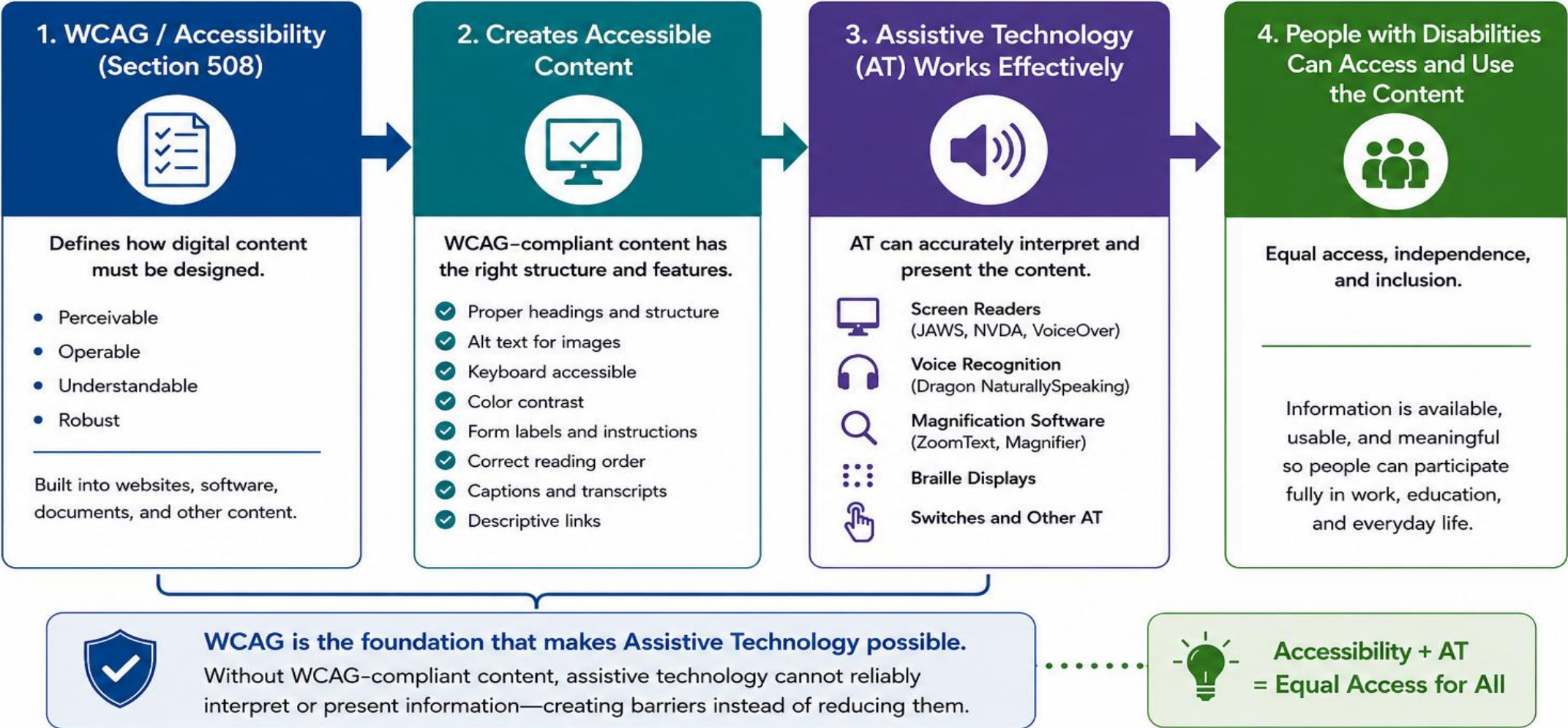
- Accessibility means designing and developing websites, tools, technologies and content so that they can be used by people with disabilities
- Encompasses all disabilities that affect access to content
 - Without Vision
 - Limited Vision
 - Without Perception of Color
 - Without Hearing
 - Limited Hearing
 - Without speech
 - Limited manipulation
 - Limited Reach and Strength
 - Limited Language, Cognitive and Learning Abilities

Percentage of WCAG Standards by Disability

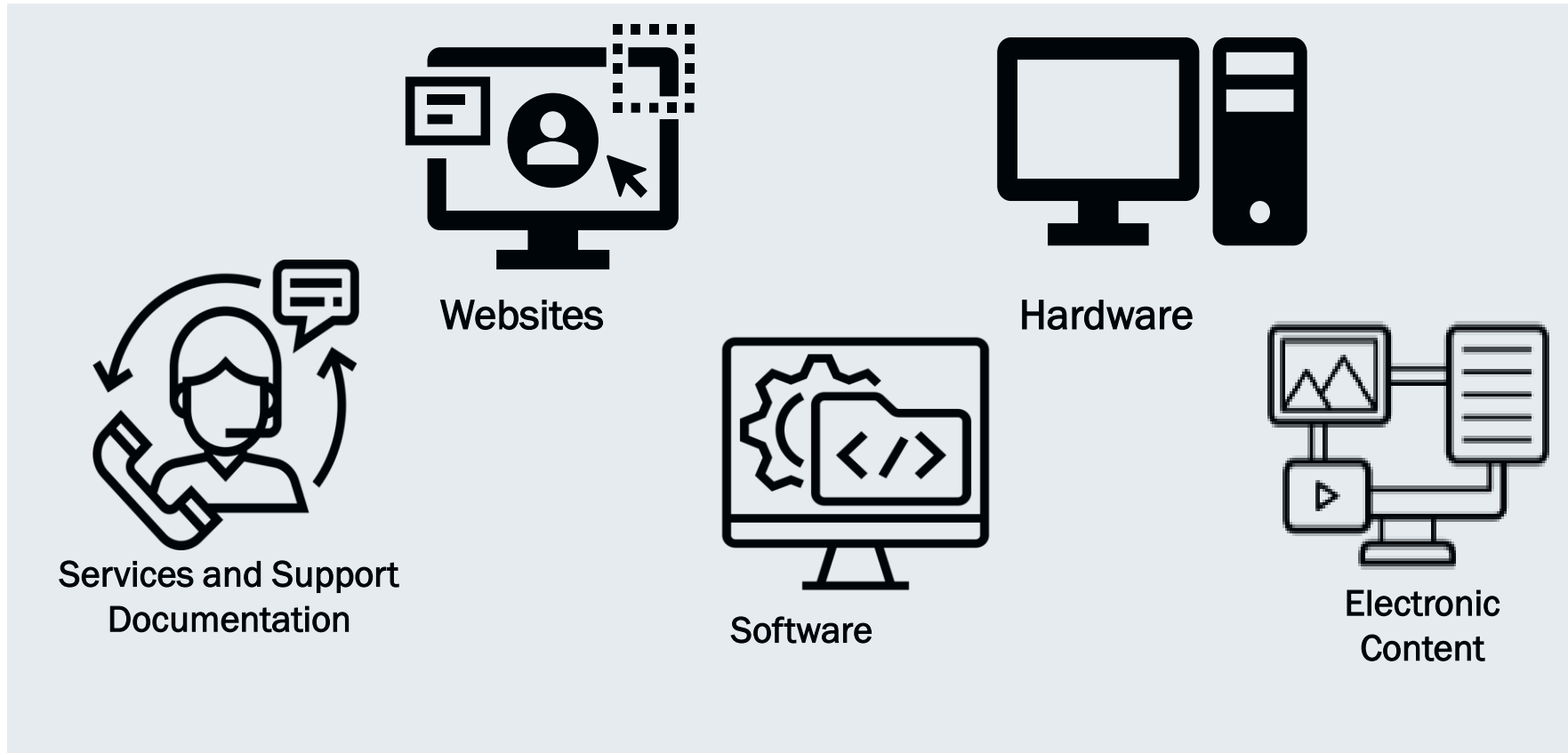


How WCAG supports Assistive Technology (AT)

Assistive technology is only effective when digital content follows WCAG and Section 508 accessibility requirements



ICT Covered by Section 508



Scope of the DHA's Section 508 Program Management Office (PMO)

- Provide Training
- Assistive Technology Coordination
- Compliance Exception Assessments
- Complaint Resolution and Enforcement
- Reporting Metrics
- Process, track, and approve ICT Compliance Exceptions
- Consult, Collaborate, and Coordinate
- Establish Policies and Procedures
- Producing OMB report on behalf of DHA

DHA Maturity Outcomes

[Entity Summary Report | Section508.gov](#)

Dimensions	Maturity Bracket
IT Accessibility Program	Moderate
Policies, Procedures, Practices	Moderate (highest)
Communications	Moderate
Content Creation	Moderate
Human Capital, Culture & Leadership	Low
Technology Lifecycle Activities	Low
Testing and Validation	Moderate
Acquisition and Procurement	Very low (lowest)
Training	Low

DoW Analytics for DHA Websites

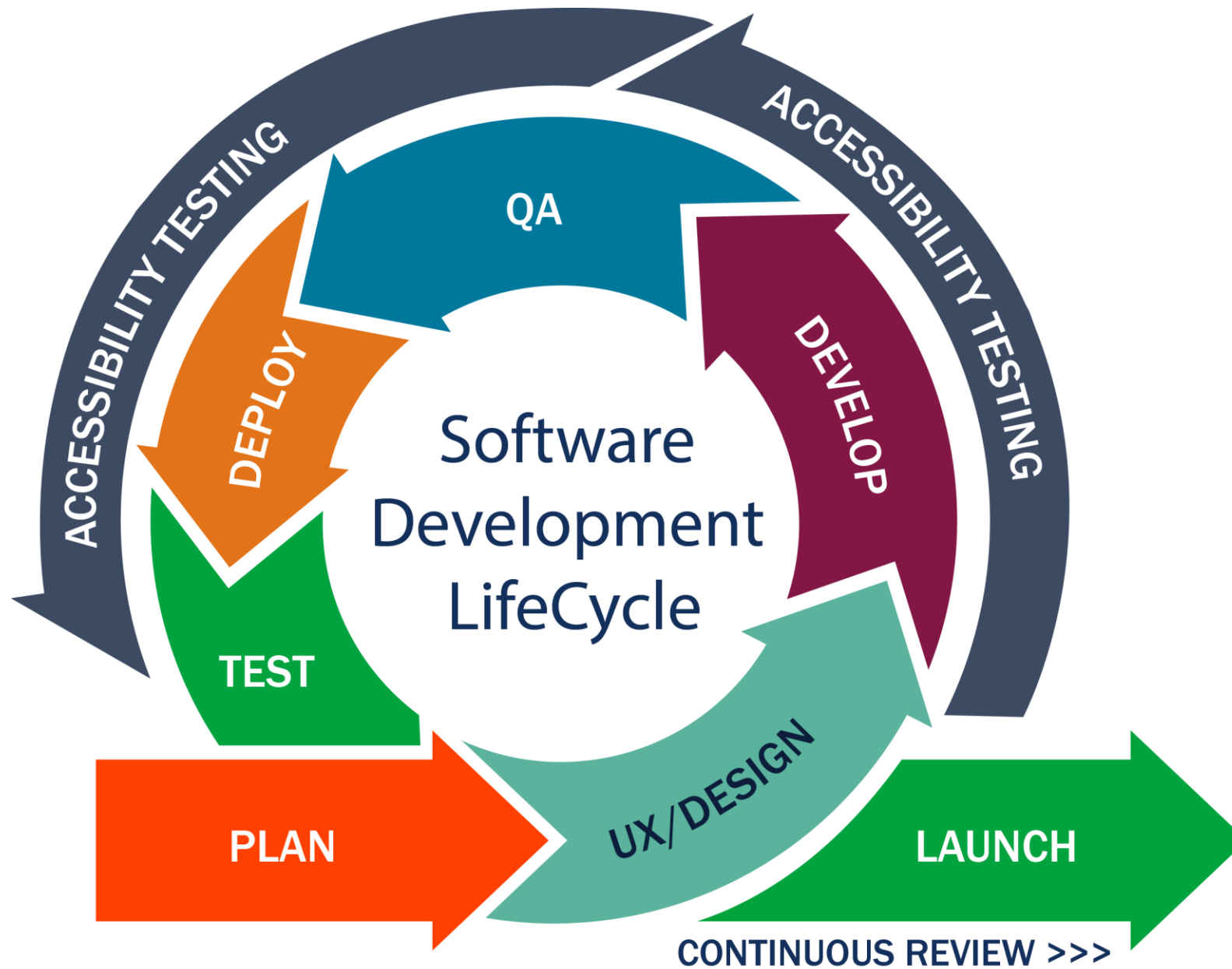
Jan 1st, 2024 - Dec 31st, 2024

- Tricare.mil
 - Rank 8, 7,372,055 Active Users
- Health.mil
 - Rank 23, 2,969,648 Active Users

Jan 1st, 2025 – Dec 31st, 2025

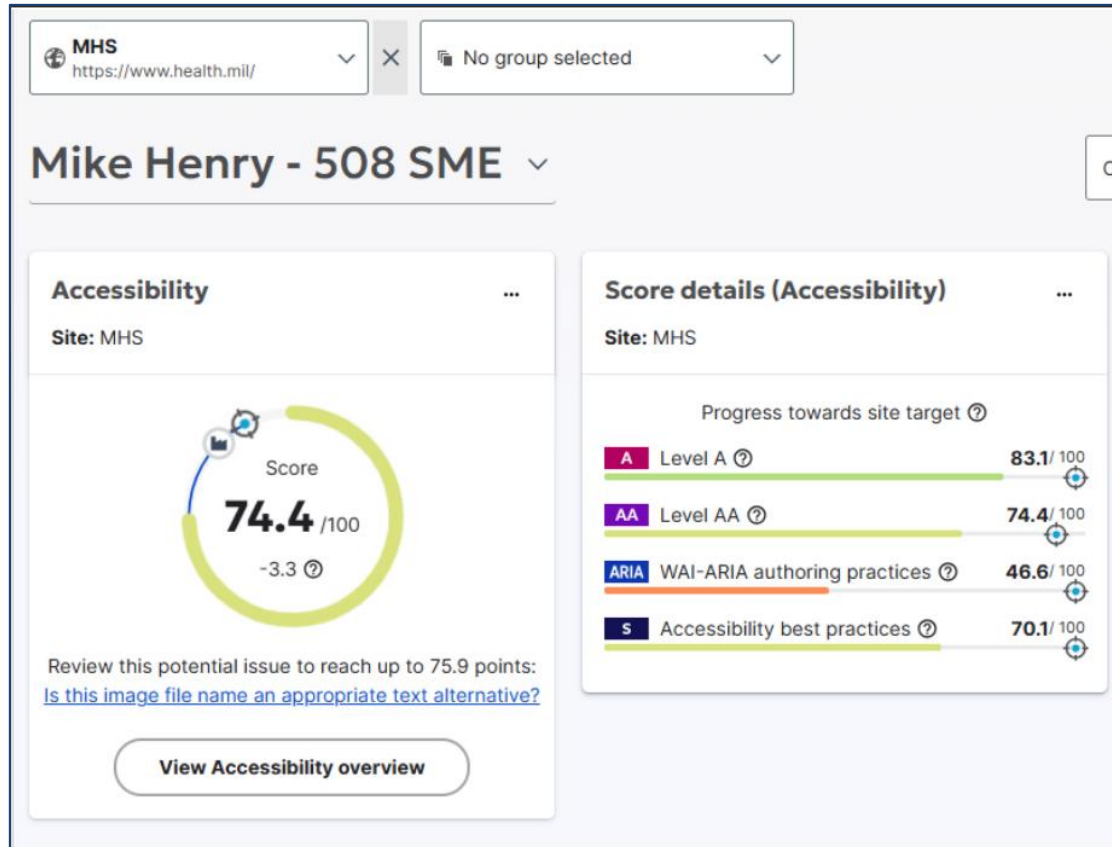
- Health.mil
 - Rank 5, 4,441,882 Active Users
- Tricare.mil
 - Rank 9, 3,582,580 Active Users
- DHA.mil
 - Rank 100, 314,879 Active Users

Integrating Section 508 Conformance into Web Development Processes

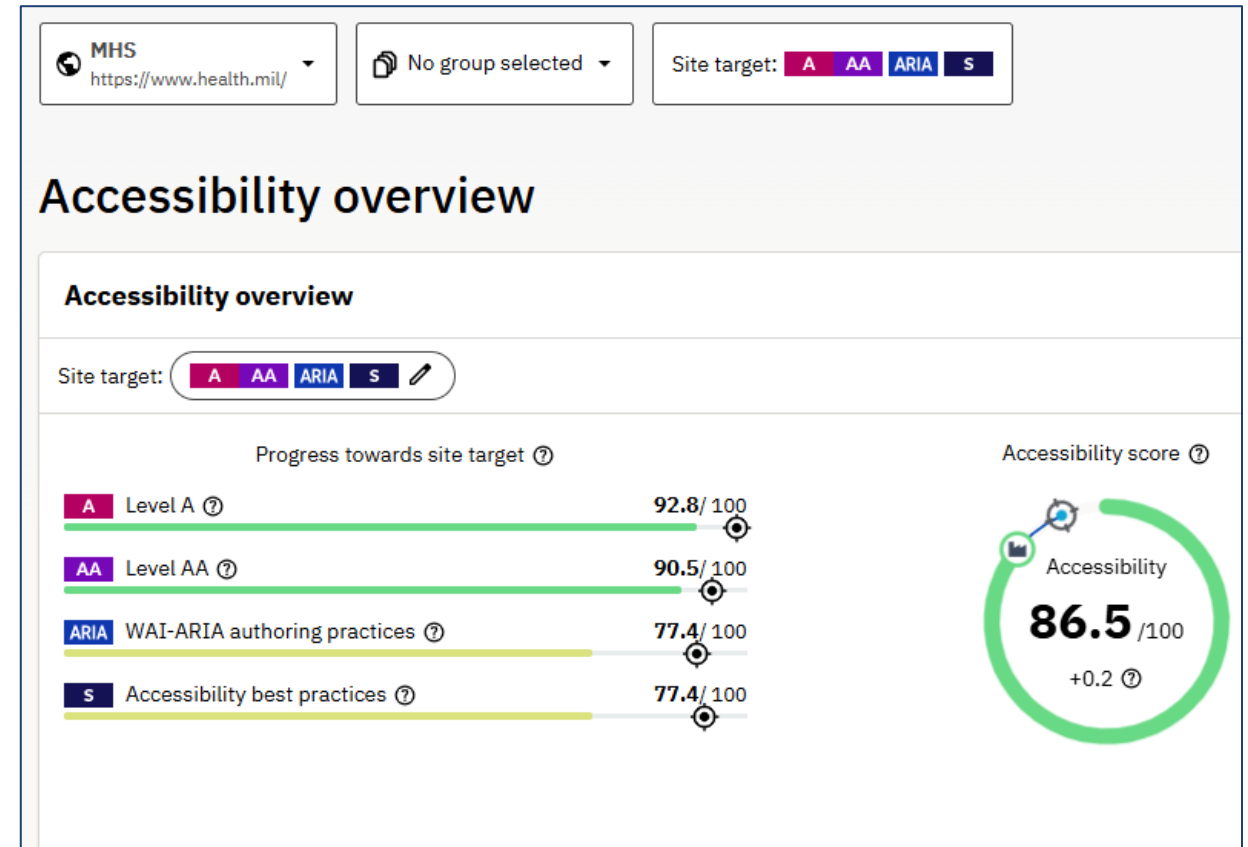


Siteimprove Health.mil Data February 2025 and July 2026

February 2025

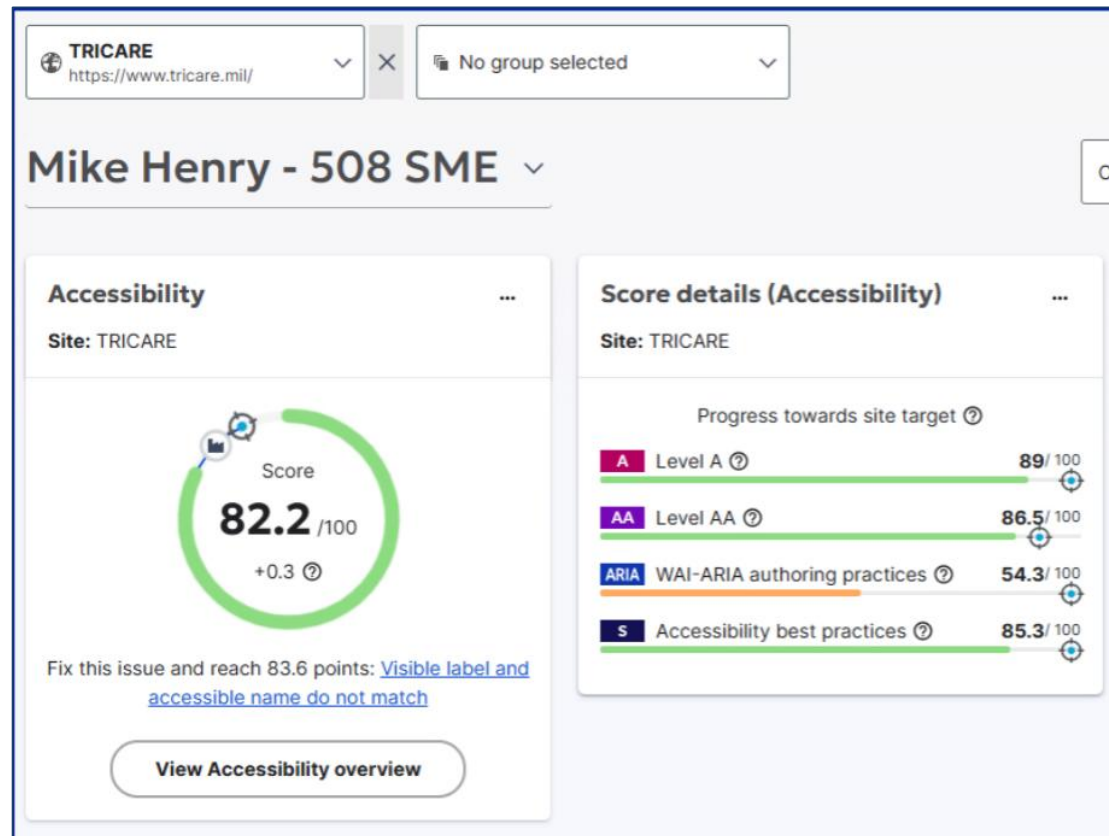


July 2026

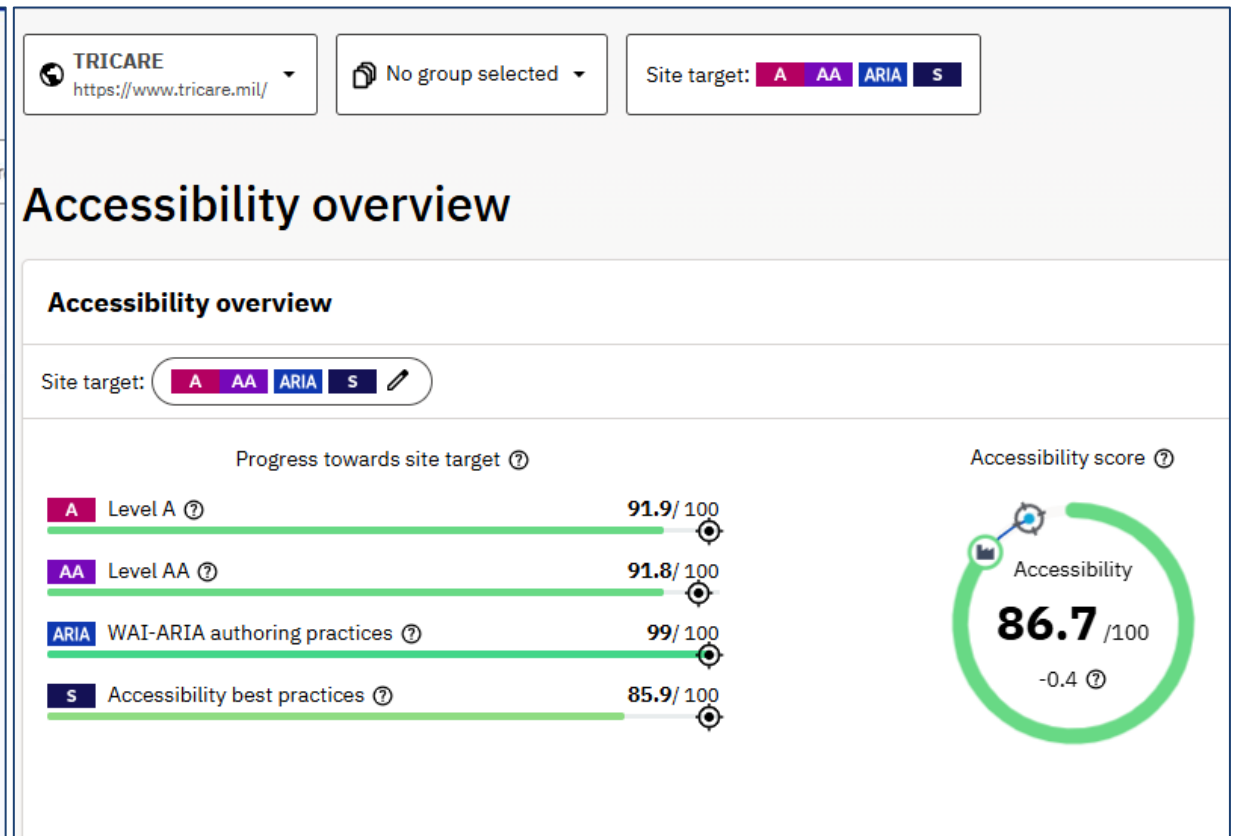


Siteimprove TRICARE.mil Data February 2025 and July 2026

February 2025



July 2026



Most Common Accessibility Pitfalls (1 of 3)

Accessibility Issue	What it means	How to address
Color Contrast	- This is the most common failing - Minimum requirements is 4.5:1 for regular text and 3:1 for larger or bold text 	- Always check color contrast in the design phase, and test again before deployment *WebAIM's "Million Report," conducted February 2026 (https://webaim.org/projects/million/)
Missing Alt attributes	More than half the home pages on the web were found to have this issue - ALT text provides a text equivalent to an image. - Without it, screen readers will receive no information, or will announce the file name	<u>Decorative images</u>: the ALT attribute should be empty/marked decorative <u>Meaningful images</u>: require accurate and descriptive ALT text that details the information in the image



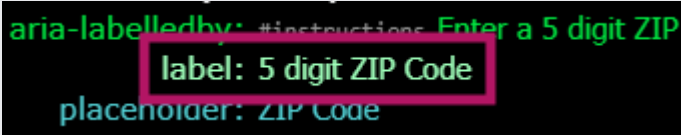
Meaningful ALT Text Example:
A female healthcare professional stands beside an elderly female patient on a hospital bed with a hand on the patient's shoulder.



Decorative Image Example:
Icons such as this lightbulb do not contribute information and should be **marked decorative**.

☒ Mark as decorative ⓘ

Most Common Accessibility Pitfalls (2 of 3)

Accessibility Issue	What it means	How to address
Keyboard Navigable	- WCAG criteria requires all interactions be operable through keyboard - Avoid keyboard traps and unpredictable/illogical focus order - Include clear and obvious focus indicators, and do not disable the browser's default focus styling 	- Use native HTML tags for interactive elements (eg, <button>, <a>, <input>) rather than adding functionality and roles to generic <div> tags. - Every feature should be tested using only the Tab key, arrow keys, Enter, and Escape. Put the mouse away when testing!
Missing form labels	- Every form element requires a descriptive <label> that is programmatically associated to the form field - Most common mistake is to rely on placeholder text in the field, but this text typically disappears as soon as the field is focused on. 	For every form element, include a <label> that is programmatically associated to the form field via the 'for' attribute. There are other solutions, but this is the easiest and most effective. 

Most Common Accessibility Pitfalls (3 of 3)

Accessibility Issue	What it means	How to address
Empty links and <button>s	- Nearly half of surveyed home pages have empty links or buttons - This includes text links (<a>) with no content and image links with no ALT text Element: <a> Accessibility Components: 3 innerText: Go to TRICARE home href: / child alt: TRICARE logo ANDI Output: TRICARE logoGo to TRICARE home	- Ensure that all text links have clear, unambiguous content. Vague links like “Read more” or “Click here” are just as bad as no content. - For image links, make sure to include ALT text or use aria-label* to apply an accessible name to the image.

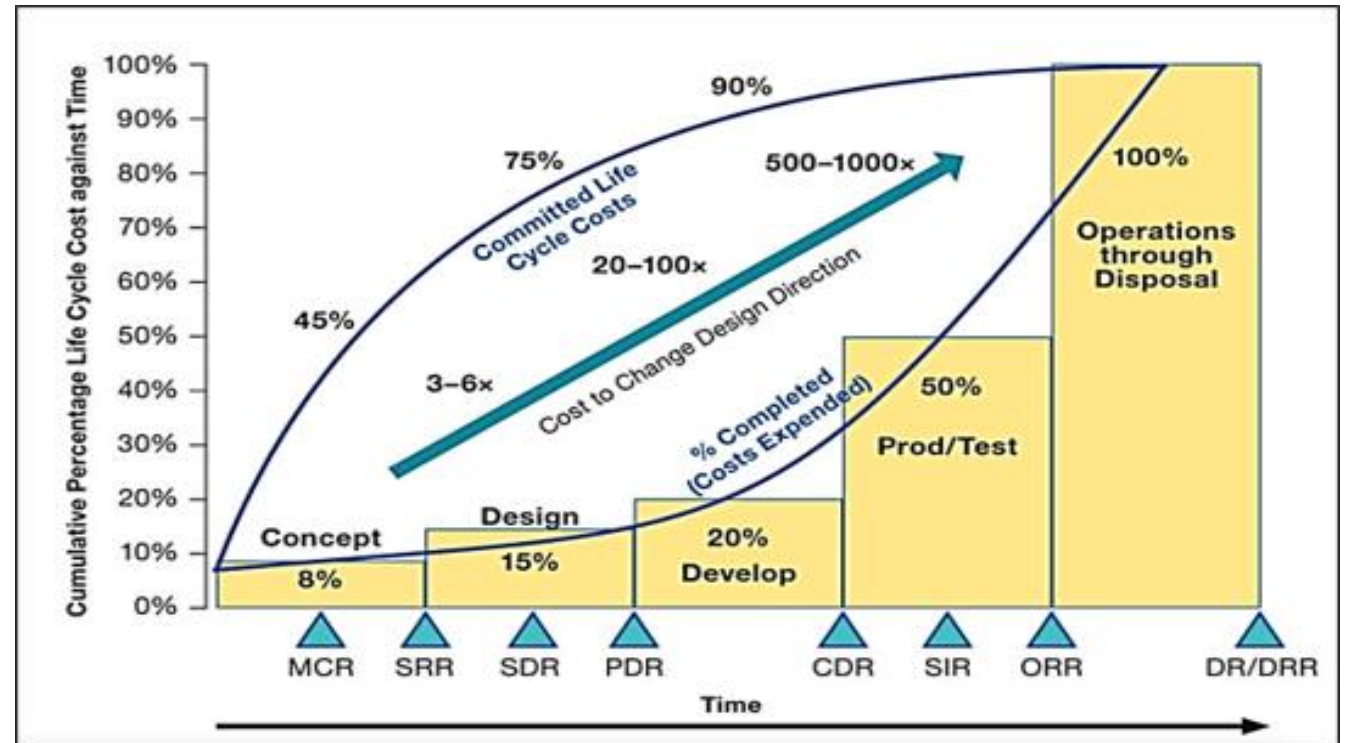
***ARIA can cause more problems than it solves when not used properly. The first rule of ARIA is: “Don’t use ARIA.”**

Myth: Accessibility is Expensive!

Life-Cycle Cost Impact from Early Phase Decision-Making International Council on Systems Engineering (INCOSE)



- This myth originated from the cost of remediating inaccessible software or products after the fact, and/or at the end of the design process
- According to INCOSE and NASA research efforts, the cost to change design at:
 - Design Stage costs 3 – 6x (times greater)
 - Development Stage costs 20 – 100x.



¹INCOSE (2015) *Systems engineering handbook*. Fourth. Edited by D. D. Walden, G. J. Roedler, K. J. Forsberg, R. D. Hamelin, and T. M. Shortell. San Diego, CA, USA 92111-2222: John Wiley & Sons.

² National Aeronautics and Space Administration (NASA) (2019) *Systems Engineering Handbook*. <https://www.nasa.gov/seh/2-5-cost-effectiveness-considerations#Fig2-5-1>

Reporting for Conformance

VPAT = Voluntary Product Accessibility Template

- A document template used to create an ACR
- Prepopulated with the standards (and guidelines) criteria and instructions
- These reports consists of descriptions of the product or service being evaluated, accessibility standards it meets (or doesn't), why this is the case, and any potential workarounds (if possible)
- Why was the VPAT developed?
 - Procurement tool - Helps Federal agencies and other buyers determine accessibility of information technology products and services
 - Self-assessment tool - Provides a framework for companies to evaluate their own products
 - Consistent format - Makes comparing products easier when companies use the same reporting mechanism
 - Address levels of support - Enable showing how well products support each requirement



It's important that a **current** version of the VPAT be used to ensure that the proper guidelines are being assessed.

The current version is **2.4 (2.5, November 2023 but minor change)** and no version prior to January 2018 (when the Refresh went into effect) should be accepted.



Four editions

- VPAT-WCAG (includes all WCAG versions 2.0/2.1/2.2)
- VPAT-508 (includes Section 508 standards and WCAG 2.0 Level A&AA)
- VPAT-EU (includes EN 301 549 and WCAG 2.1 Level AA)
- VPAT-Int (includes all digital accessibility standards –all the above)

Which edition to use?

Depends on your customers' requirements, marketing requirements for your company, and plans to distribute (Europe, U.S. only, or international)

ACR = Accessibility Conformance Report

- At their heart, VPATs are just templates used to draft Accessibility Conformance Reports
 - The filled out VPAT – answering how the product meets the criteria
- Reports conformance to accessibility standards
- The ACR is a statement of conformance, it is not a certification
- It states how well the product conforms to each of the criteria listed for a standard
- Vendors are asked to give yes/no answers to 'Is the product accessible?'
 - It ignores the complexity involved in conforming to accessibility standards
 - ACR helps to report the “degree of conformance”
- [Reporting Conformance to ICT Accessibility Standards](#) (August 06, 2019)
- A white paper on why a yes/no answer for accessibility doesn't work

WCAG Report

- The next sections of the VPAT are split by conformance level and whether they are requirements for level A, AA, or AAA
- In order to reach compliance, all elements of the A and AA must be either supported or partially supported with adequate explanations of alternate means to meet that criteria
- Full template can be downloaded from:
<https://www.section508.gov/sell/vpat/>
- Another good source is:
<https://www.itic.org/policy/accessibility/vpat-training>

VPAT Example

Table 1: Success Criteria, Level A

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Also applies to: EN 301 549 Criteria 9.1.1.1 (Web) 10.1.1.1 (Non-web document) 11.1.1.1.1 (Open Functionality Software) 11.1.1.1.2 (Closed Functionality Software) 11.8.2 (Authoring Tool) 12.1.2 (Product Docs) 12.2.4 (Support Docs) Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs)	Web: Electronic Docs: Software: Closed: Authoring Tool:	Web: Electronic Docs: Software: Closed: Authoring Tool:

Buyer's VPAT Checklist

Questions	Response
Does the VPAT cover the version of the software that you wish to purchase?	
Does the description of the product match what you thought you were purchasing?	
Was the VPAT conducted by an outside agency?	
If so, is it one that is reputable (for example: Deque, Perkins Access, TPGi)	
If the VPAT was conducted internally at the vendor, do they list their methodology?	
If so, does their methodology cover the use cases the software is being purchased for?	
Does the standards/guidance section have 'Yes' answers for WCAG 2.0 at the A and AA level?	
Are Table 1 (Level A Success Criteria) or Table 2 (Level AA Success Criteria) filled out with no empty cells?	
All criteria relevant to use cases the software is being deployed for have ratings of 'Supports' or 'Partially Supports, and if partial, satisfactory explanation is provided for an alternative methodology for the function	

Response:

- Supports
- Partially Supports
- Does Not Support
- Not Applicable
- Not Evaluated

Resources

VPAT Resources

- VPAT Files
 - <https://www.itic.org/policy/accessibility/vpat>
- How to meet WCAG 2.2
 - <https://www.w3.org/TR/WCAG22/#requirements-for-wcag-2-2>
- WCAG2ICT Overview
 - <https://www.w3.org/WAI/standards-guidelines/wcag/non-web-ict/>

Accessibility Standards Websites

World Wide Web Consortium (W3C)

- [W3C Home Page](#)

Web Accessibility Initiative (WAI)

- [Home | Web Accessibility Initiative \(WAI\) | W3C](#)

Web Content Accessibility Guidelines (WCAG)

- [WCAG 2 Overview | Web Accessibility Initiative \(WAI\) | W3C](#)

Accessible Rich Internet Applications (ARIA)

- [WAI-ARIA Overview | Web Accessibility Initiative \(WAI\) | W3C](#)

ISO/IEC 40500:2012

- [W3C Web Content Accessibility Guidelines \(WCAG\) 2.0 – Information Technology](#)
- [WCAG 2 Overview | Web Accessibility Initiative \(WAI\) | W3C](#)

ISO/IEC 30071-1:2019

- [Development of user interface accessibility – Part 1: Code of practice for creating accessible ICT products and services](#)

Government Accessibility Websites

Section 508

<https://section508.gov/>

US Access Board

<https://access-board.gov/>

Federal Acquisition Regulations (FAR)

https://www.acquisition.gov/far/part-39#FAR_Subpart_39_2

Equal Employment Opportunity Commission

<https://www.eeoc.gov/eeoc-disability-related-resources>

Creating Accessible Video, audio and social media

<https://www.section508.gov/create/video-social/>

How to Contact the 508 PMO

- Email us at dha.ncr.j-6.mbx.dhasection508pmo@health.mil
- Have an accessibility issue? [508 Accessibility Form](#)
- Want to check out our in-house resources? [Home of DHA Section 508 PMO \(health.mil\)](#)

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Thank You!



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