



## Section 508 Checklist for Acquisitions

### Purpose

The checklist represents the minimum amount of documentation required for [Section 508](#) review during the acquisition process. Section 508 must be addressed prior to requesting a critical partner review. The checklist is not a comprehensive conformance report nor a replacement for a critical partner review. Section 508 is a standalone process outside of other HHS processes.

Criteria within [Project Requirements](#), [Market Research](#) and [Acquisition Package Material](#) are required for IT Acquisition Review (ITAR) Section 508 critical partner approval. Criteria in [Proposal Evaluations](#) and [Post-Award Digital Accessibility Life Cycle Milestones](#) do not impact ITAR approval.

Always assume Section 508 is applicable, unless determined by an OpDiv Digital Accessibility Program Manager. In rare instances a [Section 508 General Exception](#) may apply. Meaning Section 508 applies but the ICT is not required to conform. Only the OpDiv Digital Accessibility Program Manager can authorize an exception.

### Project Requirements

- |  |     |    |
|--|-----|----|
| 1. Are COTS/GOTS [includes cloud licenses] and/or services to be acquired? (COTS = Commercial off the Shelf; GOTS = Government off the Shelf)        |     |    |
| 2. Engaged the <a href="#">OpDiv Digital Accessibility Program</a> for guidance?   | Yes | No |
| 3. Determined applicable provisions in <a href="#">508 Chapter 2: Scoping Requirements</a> and <a href="#">255 Chapter 2: Scoping Requirements</a> ? | Yes | No |

### Market Research

#### COTS/ GOTS conformance considerations

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|--|-----|----|
| 1. More than one (1) product on the market meets the business needs?   | Yes | No |
| 2. Obtained product(s) accessibility conformance report (ACR)? (Note: format may be a <a href="#">Voluntary Product Accessibility Template (VPAT)</a> , an <a href="#">agency checklist</a> , or another OpDiv Digital Accessibility Program approved format.) If yes: | Yes | No |
| a. ACR(s) have a creation date of within the last two (2) years?   | Yes | No |
| b. Manual testing is identified in the evaluation method?  | Yes | No |
| c. Web Content Accessibility (WCAG) 2.1 A & AA criteria evaluated?   | Yes | No |
| d. Revised Section 508 standards evaluated?  | Yes | No |
| 3. Received a functional product demo to establish a <a href="#">conformance baseline</a> ?  | Yes | No |
| 4. Confirmed supplier or purchaser can modify the product to meet conformance requirements? (Note: Code-level access is important to address defects. Low-code options often do not provide flexibility to address conformance.)                                       | Yes | No |

#### Services conformance considerations

- |   |     |    |
|---|-----|----|
| 1. Potential vendors have experience meeting conformance? (i.e., Previous Section 508 experience listed; indicate having accessibility staff) | Yes | No |
|---|-----|----|



**Acquisition Package Material**

- 1. Acquisition Plan (AP) indicates Section 508 applies? Yes    No
  - a. If no, has an exception been granted by an OpDiv Digital Accessibility Program Manager? Yes    No
- 2. Is the [minimum, standard HHS Section 508 acquisition language](#) inserted in the Performance Work Statement (PWS), Statement of Objectives (SOO), or Statement of Work (SOW)? Yes    No
  - a. Is the Section 508 language in a standalone section? Yes    No
  - b. Is additional situational or task-specific Section 508 language present? Yes    No
- 3. Are technical evaluation criteria included in the package? Yes    No
  - a. Is Section 508 one of the technical factors for evaluation? Yes    No
  - b. Does the Section 508 criteria require: details of previous experience meeting conformance, ACRs for products/platforms, and how the development/creation efforts associated with the objectives will be measured to achieve [HHS digital accessibility conformance standards](#)? Yes    No

**Proposal Evaluations**

Criteria for proposal review, prior to vendor selection. (Occurs post-ITAR approval.)

- 1. Do vendors’ key personnel or resumes list accessibility credentials? (E.g., DHS Trusted Tester or International Association of Accessibility Professionals (IAAP)) Yes    No
- 2. Vendors’ proposals, ACR(s), or other information identifies tools used to conduct conformance reviews? (E.g., ANDI, Microsoft Insights, DevTools, etc.) Yes    No
- 3. Confirmed phrases such as “EIT”, “1194.21, 1194.22, 1194.24, 1194.31, or 1194.41”, “HHS Product Accessibility Template (PAT)” are **NOT** present? Yes    No
- 4. Has the OpDiv Digital Accessibility Program been engaged to be part of the technical evaluation panel (TEP) or to consult on the technical proposals? Yes    No

**Post-Award Digital Accessibility Life Cycle Milestones**

- 1. Do all processes, sprints, milestones, etc. include Section 508 conformance measures prior to implementation, publication, or release?
- 2. Does a plan exist for providing alternative means when users encounter issues? (E.g., a resource contact)
- 3. Is the contracting officer’s representative (COR) prepared to ensure [HHS checklist\(s\)](#) or respective OpDiv Digital Accessibility Program report(s) indicate full conformance accompany deliverables prior to acceptance?
  - a. Does the COR plan to ensure primary deliverables containing downloadable or exportable content formats, are accompanied by checklist(s) or report(s) for each format that confirm conformance? (E.g., Website generates PDFs; contains multimedia)