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Section 508 Refresh

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Executive Summary

What is Section 508?

Section 508 standards that are incorporated into the federal acquisition requirements apply to information and communication technology (ICT) that is used, developed, procured, maintained, or used by federal agencies. The standards, which have been in place for over 15 years, promote ICT that can be accessed by the public and employees with disabilities.

> **Section 508** covers technology procured by a federal agency under contract with a private entity or produced within the agency itself.

Section 508 covers technology procured by a federal agency under contract with a private entity or produced within the agency itself. It applies to all Electronic and Information Technology (EIT) including software, web sites, web applications, and hardware applications such as computers, networks, peripherals, and other types of electronic office equipment. EIT is defined as "any equipment or interconnected system or subsystem of equipment that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information."

The Refresh

On January 18, 2017, revised ICT standards and guidelines created by the U.S. Access Board (generally referred to as the "Section 508 Refresh" or "the Refresh") were published in the Federal Register. The revised standards and guidelines modernize the approach of standards application, and harmonize with international voluntary consensus standards and Section 255 of the Telecommunications Act.

The updated standards reflect changes in the technology landscape due to development of new technologies, the convergence of technologies and the increasingly multi-functional capabilities of products such as smart phones. The Refresh broadly maintains the current structure of the requirements with technical and functional standards, but arranges the technical standards around product features rather than types of products. The Section 508 revised standards bring harmonization with international standards, most notably the Web Content Accessibility Guidelines 2.0 (WCAG 2.0), which are incorporated by reference. This means WCAG 2.0 conformance requirements are used to measure compliance of documents, web content, and software (when applicable) for Section 508. In addition, for software and mobile apps, the World Wide Web Consortium's Guidance on applying WCAG 2.0 to Non-web ICT needs to be taken into consideration when determining compliance with Section 508.

The interoperability requirements are updated to be more clear as to how technology (e.g., operating systems, software toolkits, platforms, and browsers) must work together with assistive technology (e.g., screen readers, screen magnifiers, and speech recognition) to increase or maintain access by people with disabilities. Additional interoperability requirements also surround the use of application programming interfaces (API).

The new standards also indicate that all types of public facing content, as well as specific categories of non-public facing content that communicate agency official business, would have to be accessible to people with disabilities as well. Previously, it was not clear if this content was covered under Section 508 or not, especially when it was not posted to a website.

Federal agencies must comply with the new Section 508 standards by January 18, 2018, one year following the publication of the standards. Updates to Section 255 are also effective March 21, 2017, though compliance with Section 255 is not mandated until those guidelines are adopted by the Federal Communications Commission (FCC). A safe harbor has been created for ICT that is used, maintained, or developed after January 18, 2018 and already complies with the current Section 508 standards. As long as the ICT has not been altered in a way that affects the user interface, data, or interoperability it will not have to follow the revised standards. When ICT is altered, the component that was altered will have to meet the revised standards while the unaltered components would continue to fall under the safe harbor.

A Brief History of Section 508

Overview

Section 508 of the Rehabilitation Act of 1973 (as amended 1998) (29 USC § 794d) requires that when U.S. Federal government agencies develop, procure, maintain, or use electronic and information technology (called EIT in the current law), federal employees and members of the public with disabilities must have access to and use of information and data that is comparable to that of those who do not have disabilities, unless such a change would impose an undue burden on the agency.

By statute, the scope of Section 508 is limited to the federal sector. It does not apply to the private sector, nor does it directly impose requirements on federal funds recipients. However, the Department of Education interprets the Assistive Technology Act (AT Act) to require states receiving assistance under the AT Act State Grant program to comply with Section 508, including the standards of the Access Board. In a similar fashion, other agencies administering federal programs – most notably, the Department of Health and Human Services (DHHS) – have interpreted Section 504 of the Rehabilitation Act to cover all co-funded federal and state programs. This includes Medicare and Medicaid programs, which are funded in part with

federal funds. In practice, such interpretations generally require that any state-level programs funded in part with federal funds be accessible to people with disabilities and, in turn, conform to the Section 508 requirements.

Many US states and some local governments have also adopted the current Section 508 standards and require them in procurement.

Covered Technology

What constitutes Electronic and Information Technology, or EIT? EIT is any information technology and equipment or interconnected system or subsystem of equipment that is used to create, convert, or duplicate data or information.

EIT includes:

- telecommunication products (e.g., telephones; information kiosks, and transaction machines);
- websites;
- multimedia (e.g., content on videotapes, CDs, and DVDs);
- office equipment (e.g., copiers and fax machines); and
- services.

The published Section 508 EIT accessibility standards (FR 65 No. 246) include technical criteria, functional performance criteria, and criteria for information, documentation and support.

The **technology specific** criteria cover:

- software applications and operating systems;
- web-based information or applications;
- telecommunications products;
- video or multimedia products;
- self-contained, closed products; and
- desktop or notebook computers.

The **functional performance criteria** cover operation, including:

- input and control functions,
- operation of mechanical mechanisms, and
- access to visual and audible information.

The **information, documentation, and support criteria** require:

- access to user guides;
- installation guides for end-user installable devices; and
- customer support and technical support communications.

The Section 508 Refresh

Overview and Timing

The world was a very different place at the beginning of the 21st Century. Though many people had mobile phones, the phones certainly didn't access the Internet. Most people's experience with the Internet involved a connection through a dial-up Internet Service Provider. When Section 508 was last updated, most of today's technology was inconceivable. The Refresh is necessary to bring Section 508 in line with current Information and Communications Technology (ICT) and provide a framework for future advances.

In February 2015, the Access Board issued a Notice of Proposed Rulemaking (NPRM), inviting public comment on proposed changes to Section 508. Public hearings were held in March and April 2015 and the comment period closed at the end of May 2015. The rules were submitted for review and approval to the Office of Information and Regulatory Affairs (OIRA) in October 2016. The final rule was published in the *Federal Register* on January 18, 2017.

The effective date for the final rule is March 21, 2017. The rule was initially supposed to be effective March 18, 2017, but as a result of the 60-day regulatory freeze implemented on January 20, 2017 by Memorandum M-17-16, the effective date was delayed by one day. The delay will have no effect on the anticipated compliance date of January 18, 2018. Until that date, the old Section 508 standards are still in effect.

The Federal Acquisition Regulatory Council (FAR Council) is responsible for incorporating the updated Section 508 standards into acquisition and procurement regulations. These regulations must be updated within six months, but the FAR Council will establish the date when compliance with the new Section 508 standards will be required for acquisitions and procurements.

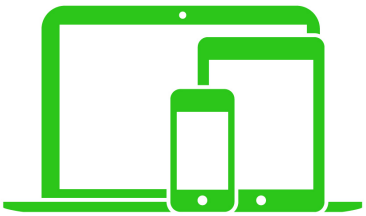
Update: As of January 2018, the FAR Council has not updated the regulations.

Changes in the Refresh

The Refresh follows the prior advanced notices by restructuring Section 508 around the function of products and services rather than types of products or services. After all, modern technology often combines different functionality into one product or service.

For example, a mobile phone contains:

- hardware,
- telecommunications services,
- software,
- web content, and
- multimedia, all in one product.



Restructuring the standards and guidelines allows those determining compliance to evaluate the product or service based on the features that it has rather than what type of product or service it is. This should reduce confusion about applicable requirements and remove repetitive standards and guidelines that were previously placed in each section to address the same issues across product types.

Scope of Electronic Content

The Refresh also makes a change in the terminology from Electronic and Information Technology (EIT) to Information and Communications Technology (ICT). The term ICT encompasses EIT as well as other communication technology such as Voice over Internet Protocol (VOIP), telecommunication products, and customer premises equipment (CPE) used for telecommunications. This updated term also takes into account modern communication methods and fits better with the harmonized Section 508 and Section 255 standards. This terminology change does not practically alter the applicability of the standards and guidelines to what was previously covered.

> Authoring tools are also covered by the Refresh, so organizations will need a system that can generate accessible content. Content creators will also need training to ensure their content conforms to WCAG 2.0 A and AA requirements.

Electronic Documents

Electronic documents are explicitly addressed in the Refresh. Electronic documents were arguably covered under the previous standards especially when posted to websites, but those requirements were not always put into practice. With the current Section 508 requirements, coverage of electronic content is limited to specific categories of information communicated by agencies to employees or to members of the general public during the conduct of official agency business, as determined by the agency mission. The standards for this content are the WCAG 2.0 A and AA conformance requirements. Although PDF/UA-1 was considered as a standard, it was ultimately not incorporated into Section 508.

Covered categories include:

- Content that is public facing or broadly disseminated within the agency, including websites, blog posts, social media posts, emails, etc.;
- letters adjudicating any cause within the jurisdiction of the agency;
- internal and external program and policy announcements;
- notices of benefits, program eligibility, employment opportunity, or personnel action;
- questionnaires and surveys;
- forms and templates;
- emergency notifications;
- formal acknowledgements or receipts;
- any educational and training materials; and
- intranet content presented as a web page.

There are two exceptions to covered content:

- **archival copies** retained solely for preserving an exact image of a hard copy, and
- **draft versions of documents** (access to draft content by an employee with a disability would likely be covered under Section 504 of the Rehabilitation Act as an accommodation).

Authoring tools are also covered by the Refresh, so organizations will need a system that can generate accessible content. Content creators will also need training to ensure their content conforms to WCAG 2.0 A and AA requirements. Product documentation, including accessibility features of products, will now need to be directly accessible without request. However, product documentation in alternative formats (e.g., Braille, large print) still must be available upon request.

In practice, these new standards will mean that many government agencies and vendors will need to make significant efforts to ensure all products that allow for authored content can create accessible content and assist authors in this process.

WCAG 2.0

The Section 508 Refresh recognizes WCAG 2.0 as the success criteria applicable to websites, electronic documents, and software. This brings the 508 standards up to date with the technologies available today, ensuring that individuals with disabilities are able to use them. WCAG 2.0 is technology-neutral, so it is easily applied to all sorts of technology.

WCAG 2.0 states that technology should be perceivable, operable, understandable, and robust.

Perceivable: Able to be seen by a person with visual impairments (through a screen reader, screen magnifier, or other assistive technology), or heard by a person who is hard of hearing or deaf (through captions, written transcript, etc.).

Operable: The technology can be operated by a user with a disability, for example, a website can be navigable by keyboard shortcuts for someone unable to use a mouse.

Understandable: The technology can be operated by users with varying cognitive abilities.

Robust: The technology is compatible with current assistive technology and is prepared to upgrade for future iterations of AT.

The WCAG 2.0 requirements are broken up into three levels:

- **Level A:** This level defines the lowest or minimum level of accessibility. Many groups of users with disabilities will find it very difficult or impossible to access information in the document. Satisfying these success criteria is the minimum set of requirements.
- **Level AA:** This level defines a higher level of accessibility. One or more groups will find it difficult to access information in the document. Satisfying these success criteria will remove significant barriers to accessing web content. In order to be AA conformance content must also be level A conformant.
- **Level AAA:** Satisfying these criteria will enhance the user experience for individuals with disabilities. Not all Level AAA success criteria can be addressed for all types of content.

Using WCAG 2.0 will also bring the U.S. government and its vendors into harmony with the international accessibility community, including coordination with the European Union, which adopted the EN 301 549 standard in 2014. This will help create a uniform experience for

users with disabilities around the world and allow vendors to conform to WCAG 2.0 A and AA standards and know their product or service will conform to Section 508.

Due to their limited applicability, the following WCAG 2.0 success criteria do not apply to non-Web documents and software under Section 508:

- **Criteria 2.4.1. – Bypass Blocks**
- **Criteria 2.4.5. – Multiple Ways**
- **Criteria 3.2.3. – Consistent Navigation**
- **Criteria 3.2.4. – Consistent Identification**

Functional Performance and Tech Requirements

Functional performance criteria are outcome-based standards that define whether something can be accessed by a person with disability. For example, The Board has clarified that the Functional Performance Criteria only apply in situations where a technology standard/guideline does not exist to address the situation. They also apply when a technical standard cannot be met. Previously, the purpose of the functional performance objectives was nebulous and thus some agencies considered that both functional and technical standards had to be met.

The functional performance criteria have been updated and some additional ones added (e.g., color perception and limited reach and strength). Functional performance criteria have also been added related to cognitive disabilities. The proposed rule had dropped the functional performance criteria for cognitive accessibility, but it was later added back in to the final rule. However, the functional performance criteria need only be applied when a technical standard can't be met or when there is no applicable technical standard. In addition, there are other functional performance criteria that may also likely need to be considered in the future (e.g., depth perception).

The low vision functional performance criterion was updated to read:

> 302.2 With Limited Vision. Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited vision.

Similarly, the updated functional performance criterion for people who are hard of hearing states:

> 302.5 With Limited Hearing. Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited hearing.

RTT Functionality

The Refresh does not include standards for real-time text (RTT). Initially, the rule proposed that RTT functionality should be provided whenever two-way voice communication is provided to allow for comparable access for people who are deaf or hard of hearing. The FCC issued a notice of intent to regulate in the area of RTT. Depending on the outcome of the FCC's rulemaking, the Access Board may update Section 508 standards in the future to include RTT.

In the Refresh, the interoperability requirements are updated to be more clear about how technology, (e.g., operating systems, software toolkits, platforms, and browsers) must work together with assistive technology (e.g., screen readers, screen magnifiers, and speech recognition) to increase or maintain access by people with disabilities.

Expanded Interoperability Requirements

Under the previous standards, ICT was required to be interoperable (i.e., compatible) with documented features of assistive technology and accessibility features. In the Refresh, the interoperability requirements are updated to be more clear about how technology, (e.g., operating systems, software toolkits, platforms, and browsers) must work together with assistive technology (e.g., screen readers, screen magnifiers, and speech recognition) to increase or maintain access by people with disabilities.

The Refresh indicates that some software that operates within a sandboxed environment within the platform, such as plug-ins like Java and Flash and media players, are exempt from some of the user preferences for accessibility.

Additional interoperability requirements surround the use of applications programming interfaces (API). APIs are agreed-upon methods of communication between software such as a platform or app and an assistive technology. The Refresh increases the requirements, not only requiring that an API be used to expose information to assistive technology, but that it also allow assistive technology to control the user interface through the API. That is, assistive technology may be required to programmatically set and change values and add event hooks to watch for changes in the application. This is very good news for users of assistive technology. The original legislation was ambiguous when it came to the compatibility between ICT and AT. The Section 508 Refresh brings much-needed specificity.

Miscellaneous Additions

In addition to WCAG 2.0, the Section 508 Refresh also references a number of other voluntary consensus standards. These include:

DESCRIPTION	REFERENCE STANDARD
Ergonomics for the design of accessible software	ANSI/HFES 200.2, Human Factors Engineering of Software User Interfaces
Interference to hearing aids by wireless telephones	ANSI/IEEE C63.19-2011, American National Standard for Methods of Measurement of Compatibility between Wireless Communications Devices and Hearing Aids
Handset generated audio band magnetic noise of wire line telephones	TIA 1083, Telephone Terminal Equipment Handset Magnetic Measurement Procedures and Performance Requirements
Speech quality in digital transmissions	ITU-T Recommendation G.722, General Aspects of Digital Transmission Systems, Terminal Components, 7 kHz Audio-Coding within 64 kbits/s
Audio description by digital television tuners	A/53 Digital Television Standard, Part 5: AC-3 Audio System Characteristics
Accessible PDF files	ISO 14289-1, Document management applications — Electronic document file format enhancement for accessibility — Part 1: Use of ISO 32000-1 (PDF/UA-1
Keypad arrangement	ITU-T Recommendation E.161: Arrangement of digits, letters and symbols on telephones and other devices that can be used for gaining access to a telephone network

Voluntary Product Accessibility Template

The Information Technology Industry Council (ITI) has introduced a new beta version of their Voluntary Product Accessibility Template (VPAT) tool. The VPAT tool helps companies evaluate their websites' compatibility with digital accessibility guidelines and put together a document to disclose the company's compliance with accessibility standards.

VPAT 2.0 has been updated not only to include the updated ICT standards from Section 508, but also incorporating the WCAG 2.0 standards, as well as EU Standard EN 301 549. VPAT 2.0 also provides updated guidance on completing the document and serves as a reporting tool for the EU standard.

Next Steps for Federal Agencies & Their Vendors

Although a safe harbor exists for ICT that conforms to the previous Section 508 standards, it is recommended that federal agencies and their vendors start getting to know WCAG 2.0 and developing their remediation plans so they are already well on their way to compliance by January 18, 2018.

Where do you start? That depends on where your organization stands currently when it comes to digital accessibility.

New to Accessibility

The best place to start is with an audit, which will give your leadership team a high-level overview of your level of compliance with WCAG 2.0 A and AA and your development team a list of violations that need to be remediated. After an audit, your development team can prioritize the most visible violations—that is, those that are likely to cause an immediate accessibility problem for users with disabilities—and work their way down the priority list.

Another important priority is adding accessibility into your planning process for new projects. It is much easier to bake in accessibility from the design and wireframe stage than to try and retrofit an existing design. Treating accessibility as a priority and not as an afterthought makes life easier for your developers and is less expensive for your organization. Remember that accessibility covers more than just users who are blind or deaf; good, accessible UX accounts for cognitive impairments, motor impairments, and the full spectrum of visual impairments from color blindness to low vision.

Already Section 508 Compliant

If you are compliant with the previous Section 508 standards and wondering what it will take to bring you into compliance with the new regulations in the Refresh, the U.S. Access Board provides a table comparing the current Section 508 to WCAG 2.0 A/AA (which we've included beginning on Page 14).

According to the Access Board, twenty-two of the thirty-eight WCAG 2.0 Success Criteria were substantially equivalent to previous Section 508 standards. This leaves 16 criteria that are new or substantially changed. Some agencies have already been going above and beyond the original Section 508 requirements and may have even fewer items on their to-do list. Since the updated Section 508 requirements harmonize with the WCAG 2.0 A and AA requirements, if you are compliant with WCAG 2.0, you should also be compliant with Section 508.

Conclusion

While there is still time before compliance with the Section 508 Refresh is required, you don't want to wait to get on board with the changes. Government agencies will want to achieve compliance with the Section 508 Refresh before the complaint window opens, and vendors should strive to meet the refreshed standards as soon as possible to avoid procurement issues.

Since the majority of the changes in the Refresh are known, and technology firms like Level Access already have tools to bring your websites and apps into compliance with WCAG 2.0 A and AA, it's best to start the auditing process immediately. This will allow you to take things at a more leisurely pace and avoid the staffing costs of having to remediate on an abbreviated timeline.

Proposed Changes Summary Chart

PROPOSED (WCAG 2.0 SUCCESS CRITERIA [LEVEL])	EXISTING 508 CORRES-PONDING PROVISION	SUMMARY	WHAT WOULD CHANGE	COMMENT
1.1.1 Non-text Content [A]	1194.22(a)	Provides for text alternatives of images and other non-text content, including user interface components	Substantially Equivalent	Proposed standard provides additional detail for 8 common categories of non-text content.
1.2.1 Prerecorded Audio-only and Video-only [A]	1194.22(a)	Provides that prerecorded audio is available in a visible format and that silent animations are available in an audible format		

PROPOSED (WCAG 2.0 SUCCESS CRITERIA [LEVEL])	EXISTING 508 CORRES-PONDING PROVISION	SUMMARY	WHAT WOULD CHANGE	COMMENT
1.2.2 Captions (Prerecorded) [A]	1194.22(b) and .24(c)	Provides for synchronized captioning of prerecorded video and multimedia.	Substantially Equivalent	Proposed standard distinguishes between live and prerecorded media.
Icon of hand putting ballot in voting box	1194.22(b) and .24(d)	Provides for audio description of prerecorded video and multimedia		
1.2.4 Captions (Live) [AA]	1194.22(b) and .24(c)	Provides for captioning of live video and multimedia		
1.2.5 Audio Description (Prerecorded) [AA]	1194.22(b) and .24(d)	Provides for audio description of live video and multimedia		
1.3.1 Information and Relationships [A]	1194.22(e) through (h)	Provides that information, structure, and relationships conveyed visually are available to users of assistive technology Provides that semantic markup be used for headings, lists, emphasized or special text, and tabular data, including the association of data cells with their headers	Substantially Equivalent	Proposed standard is written broadly and is technology neutral, whereas existing standard is specific to HTML image maps and data tables.
1.3.2 Meaningful Sequence [A]	None	Provides for a reasonable and logical reading order when using assistive technology	New	
1.3.3 Sensory Characteristics [A]	None	Provides that instructions are not conveyed only through sound, shape, size, or visual orientation	New	

PROPOSED (WCAG 2.0 SUCCESS CRITERIA [LEVEL])	EXISTING 508 CORRES-PONDING PROVISION	SUMMARY	WHAT WOULD CHANGE	COMMENT
1.4.1 Use of Color [A]	1194.21(i) and .22(c)	Provides that information and prompts are not conveyed only through color	Substantially Equivalent	No technical difference.
1.4.2 Audio Control [A]	None	Provides that there is a way to stop, pause, mute, or adjust volume with audio that plays automatically	New	
1.4.3 Contrast (Minimum) [AA]	None	Provides for specified contrast between foreground and background of text and images of text	New	
1.4.4 Resize Text [AA]	None	Provides tor content that remains readable and functional when the font size is doubled	New	
1.4.5 Images of Text [AA]	1194.21(f)	Provides for the use of text, as opposed to images of text	Substantially Equivalent	Proposed standard provides detail for two situations where images of text are permissible.
2.1.1 Keyboard [A]	1194.21(a)	Provides for functionality when using only the keyboard interface	Substantially Equivalent	Proposed standard clarifies the requirement by emphasizing the method of input, rather than the nature of the output.
2.1.2 No Keyboard Trap [A]	None	Provides that the keyboard focus is not trapped when the keyboard is used for navigation	New	

PROPOSED (WCAG 2.0 SUCCESS CRITERIA [LEVEL])	EXISTING 508 CORRES-PONDING PROVISION	SUMMARY	WHAT WOULD CHANGE	COMMENT
2.2.1 Timing Adjustable [A]	1194.22(p)	Provides for flexible time limits	Substantially Equivalent	Proposed standard provides additional options to the single approach specified in the existing provision (that the user "be alerted and given sufficient time to indicate more time is required").
2.2.2 Pause, Stop, Hide [A]	1194.21(h)	Provides for user control over moving, blinking, scrolling, and information that updates automatically	Substantially Equivalent	Proposed standard specifies options (pause, stop, hide, or control the frequency) instead of "displayable in at least one non-animated presentation mode", and allows for when animation "is part of an activity where it is essential" (for example, data that is being updated in real time).
2.3.1 Three Flashes or Below Threshold [A]	1194.21(k) and .22(j)	Provides that nothing flashes more than three times per second, unless the flash is very small and does not contain too much red	Substantially Equivalent	Proposed standard takes into consideration the size and hue of the flash.

PROPOSED (WCAG 2.0 SUCCESS CRITERIA [LEVEL])	EXISTING 508 CORRES-PONDING PROVISION	SUMMARY	WHAT WOULD CHANGE	COMMENT
2.4.1 Bypass Blocks [A]	1194.22(o)	Provides for a skip navigation link or other means to bypass repetitive content	Substantially Equivalent	Proposed standard uses the phrase “blocks of content that are repeated” instead of just “repetitive navigation links”.
2.4.2 Page Title [A]	1194.22(i)	Provides for descriptive and informative page titles	Substantially Equivalent	Proposed standard is for all types of content instead of just HTML frames.
2.4.3 Focus Order [A]	None	Provides for a keyboard-oriented navigation order that is reasonable and logical Provides that links, form elements, and other user interface controls and components have a reasonable and logical navigation order	New	
2.4.4 Link Purpose (In Context) [A]	None	Provides for a keyboard-oriented navigation order that is reasonable and logical Provides that links, form elements, and other user interface controls and components have a reasonable and logical navigation order	New	
2.4.4 Link Purpose (In Context) [A]	None	Provides that the purpose of any link is understandable from its text or context	New	
2.4.5 Multiple Ways [AA]	None	Provides for two or more means to locate content	New	

PROPOSED (WCAG 2.0 SUCCESS CRITERIA [LEVEL])	EXISTING 508 CORRES-PONDING PROVISION	SUMMARY	WHAT WOULD CHANGE	COMMENT
2.4.6 Headings and Labels [AA]	None	Provides that headings and labels are descriptive	New	
2.4.7 Focus Visible [AA]	1194.21(c)	Provides that the keyboard focus is visually apparent when using the keyboard to navigate	Substantially Equivalent	Proposed standard uses the phrase “indicator is visible” instead of “well-defined on-screen indication”.
3.1.1 Language of Page [A]	None	Provides that the default language of content is exposed to assistive technology	New	
3.1.2 Language of Parts [AA]	None	Provides that changes in language are exposed to assistive technology	New	
3.2.1 On Focus [A]	1194.21(l) and .22(n)	Provides that user interface components do not initiate a change of context when receiving focus	Substantially Equivalent	Proposed standard is explicit instead of having the requirement implicit in that “the form shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.”
3.2.2 On Input [A]	1194.21(l) and .22(n)	Provides that changing the setting of user interface components does not automatically cause a change of context		

PROPOSED (WCAG 2.0 SUCCESS CRITERIA [LEVEL])	EXISTING 508 CORRES-PONDING PROVISION	SUMMARY	WHAT WOULD CHANGE	COMMENT
3.2.3 Consistent Navigation [AA]	None	Provides that repeated navigational components occur in the same relative order each time they are encountered	New	
3.2.4 Consistent Identification [AA]	1194.21(e)	Provides that components having the same functionality are identified consistently	Substantially Equivalent	Proposed standard is for all types of content instead of just “bitmap images”.
3.3.1 Error Identification [A]	1194.21(l) and .22(n)	Provides that automatically detected input errors are identified and described in text to the user	Substantially Equivalent	Proposed standard is explicit instead of having the requirement implicit in that “the form shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.”
3.3.2 Labels or Instructions [A]	1194.21(l) and .22(n)	Provides for labels or instructions when content requires user input		
3.3.3 Error Suggestion [AA]	None	Provides that the system makes suggestions for correction when input errors are automatically detected and suggestions are available	New	

PROPOSED (WCAG 2.0 SUCCESS CRITERIA [LEVEL])	EXISTING 508 CORRES-PONDING PROVISION	SUMMARY	WHAT WOULD CHANGE	COMMENT
3.3.4 Error Prevention (Legal, Financial, Data) [AA]	None	Provides that when legal, financial, or test data can be changed or deleted the changes or deletions can be reversed, verified, or confirmed	New	
4.1.1 Parsing [A]	None	Provides that significant HTML/XHTML validation and parsing errors in source code are avoided	New	
4.1.2 Name, Role, Value [A]	1194.21(d)	Provides that sufficient information (including identity, operation, and state) about user interface components is available to assistive technology	Substantially Equivalent	Proposed standard uses the phrase “programmatically determined” instead of “available to assistive technology”.