



U.S. General Services Administration (GSA)

**GSA Order: GSA Section 508: Managing Information and Communications Technology (ICT) for Individuals with Disabilities**

2105.1E

GSA 508/Accessibility Program Office

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**Purpose:**

The purpose of this Order is to implement [Section 508 of the Rehabilitation Act of 1973](#) (as amended) throughout the General Services Administration (GSA).

**Background:**

This directive establishes policy and responsibilities for GSA's implementation of Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. §794d) (hereinafter "Section 508"); Part 1193 and 1194 of Title 36, Code of Federal Regulations (CFR); Subpart 39.2 of the Federal Acquisition Regulation (FAR) and associated regulations; and Section 508 Standards set by the United States Access Board.

Related provisions of the Rehabilitation Act include Section 501 (29 U.S.C. §791), which prohibits employment discrimination against individuals with disabilities in the federal sector, and Section 504 (29 U.S.C. §794), which prohibits federal executive agencies, programs and activities that receive federal financial assistance such as grants from discriminating based on a disability.

**Applicability:**

1. The provisions of this Order are applicable to all GSA employees involved in the design, development, procurement, management, or use of Information and Communication Technology (ICT), to include information technology and other equipment, systems, technologies, or processes for which the principal function is the creation, manipulation, storage, display, receipt, or transmission of electronic data and information, as well as any associated content.
2. This Order applies to all GSA Services, Staff Offices, and Regional Offices (S/SO/R), regardless of whether they employ individuals with disabilities or not.
3. This Order applies to the Office of Inspector General (OIG) to the extent that the OIG determines this Order is consistent with the OIG's independent authority

under the IG Act and it does not conflict with other OIG policies or the OIG mission.

4. This Order applies to the Civilian Board of Contract Appeals (CBCA) to the extent that the CBCA determines it is consistent with the CBCA's independent authority under the Contract Disputes Act and other authorities and it does not conflict with the CBCA's policies or the CBCA mission.
5. This Order applies to the Government-wide Policy (OGP) to the extent that the OGP determines it is consistent with the OGP's independent authorities and it does not conflict with the OGP's policies or the OGP's mission.

**Cancellation:**

1. This Order supersedes and cancels CIO 2105.1D CHGE 1 GSA Section 508: Managing Information and Communications Technology (ICT) for Individuals with Disabilities, dated January 7, 2019.
2. This Order supersedes and cancels CIO 2105.1C CHGE 1 GSA Section 508: Managing Information and Communications Technology (ICT) for Individuals with Disabilities, dated August 20, 2015.
3. This Order supersedes and cancels CIO 2105.2 P GSA Section 508 Procedures Handbook, dated December 16, 2009.

**Summary of Changes:**

1. This CIO Directive was closely aligned with Statutory requirements,
2. Streamlined information in this document,
3. Updated Point Of Contacts (POCs),
4. Updated References and/or URLs,
5. Used plain language as much as possible.

**Roles and Responsibilities:**

1. Heads of Services and Staff Offices (HSSO). HSSOs will:
  - 1.1. Support efforts of management and technical personnel to ensure that all ICT developed, procured, maintained, or used by GSA is accessible to

individuals with disabilities. This includes access to and use of Federal electronic information resources and/or work-related ICT resources;

- 1.2. Appoint Section 508 point of contact (POC) for each of the S/SO/Rs to respond to employee inquiries on Section 508 and accessibility. The [list of contacts](#) is posted on InSite;
- 1.3. Respond to the GSA 508 Program Office's data call to confirm the availability or update of the S/SO/R Section 508 POC; and
- 1.4. Ensure management personnel under their direction:
  - 1.4.1. Require ICT conforms to the applicable Section 508 standards and is accessible to people with disability.
  - 1.4.2. Require all electronic content used for external and internal official agency communications (see the definition of Agency Official Communications, below, for details), including such content posted to the agency websites, conforms to the applicable Section 508 standards.
  - 1.4.3. Inform employees of the [Section 508 POC](#) for the S/SO/R;
  - 1.4.4. Require ICT resources be readily configured to accommodate the needs of individuals with disabilities. Exceptions may be granted by the GSA CIO or GSA Section 508 Program Manager for certain types of ICT in accordance with the [Section 508 Standards](#). See GSA [Guidance for exceptions management- exception application and approval processes in GSA insite](#).
  - 1.4.5. Require S/SO/R POCs and employees involved in the design, development, procurement or use of ICT take at least two hours of Section 508 accessibility and/or technical training every two years.
  - 1.4.6. Require accessibility be planned for and monitored throughout the ICT acquisition and systems development life cycles. The HSSO must require that all government specific products meet Section 508 Standards. [GSA guidance](#) requires GSA organizations to:
    1. Determine resources and efforts requirements,
    2. Conduct market research,
    3. Develop contractual terms and conditions (solicitation language),

4. Evaluate proposals, and
  5. Validate contractor compliance through the end of the contract.
- 1.4.7. Enforce captioning of all audio and video multimedia developed or procured and posted on a GSA website unless there is a clear and compelling reason not to, such as when waiting for closed captioning would harm GSA's ability to communicate immediately on an important issue. If a video is posted on a GSA website without captioning, a note must be added to the video description explaining why the material was posted without captions and when closed captions would be available; and
  - 1.4.8. Test and remediate all websites, web applications and mobile apps to meet the [Section 508 Standards](#).
- 1.5. GSA Requiring Officials. Requiring officials will:
    - 1.5.1. Develop Section 508 technical requirements and ensure they are included in the solicitation requirements document. The [Accessibility Requirements Tool \(ART\)](#) or [Solicitation Review Tool](#) is recommended for use to develop the requirements.
    - 1.5.2. Conduct market research to determine if solutions exist including the accessibility features and functionality needed, as defined in the accessibility requirements.
    - 1.5.3. Request [Accessibility Conformance Reports](#) (ACRs) from Vendors and Contractors, using the current version of the [Voluntary Product Accessibility Template](#) (VPAT) when procuring commercially developed ICT products (e.g., Commercial or Government off-the-shelf products). Procuring ICT products without ACR may cause the violation of laws, regulations, and an undue burden to GSA. Exceptions may be granted by GSA CIO or GSA 508 Program Manager (as allowed by Section 508 and US Access board guidelines). Please email the 508 Program Manager at [508PMO@gsa.gov](mailto:508PMO@gsa.gov) for Exception Requests or inquiries.
    - 1.5.4. Evaluate ICT solicitations against Section 508 Standards and factor accessibility into Technical Evaluation Panels (TEP) and award decisions.

- 1.5.5. Specify contractual terms and conditions for assessing and evaluating vendor accessibility claims, and to ensure accessibility throughout the product life cycle. Any misleading (or wrong) information in the vendor accessibility claims or ACR may result- (i) cancellation of the contract, products and services; (ii) legal actions and penalties and compensation for any damage to the Government; and iii) remediation to the product at no cost to the government to bring it into compliance.
- 1.5.6. Validate contractor compliance to ensure ICT remains accessible throughout the contract period of performance.
- 1.6. Contracting Personnel. Contracting Officers, Contracting Officer Representatives, Contracting Specialists, and others involved in the acquisition of ICT will:
  - 1.6.1. Review and comply with the acquisition regulations for implementing Section 508, found at FAR [7.103](#), [10.001](#), [11.002\(f\)](#) and [subpart 39.2](#), as well as ensuring compliance with GSA Policies;
  - 1.6.2. Be familiar with the [Acquisition Portal Section 508 topic webpage](#), which contains additional guidance and resources for complying with FAR [7.103](#), [10.001](#), [11.002\(f\)](#) and [subpart 39.2](#); and
  - 1.6.3. Complete at least 2 hours of Section 508 awareness and/or technical training every 2 years.
- 1.7. The Chief Information Officer (CIO) and the Office of GSA IT. The CIO is the [senior agency official responsible for establishing guidance on ICT accessibility management](#), to include ensuring access to ICT products for persons with disabilities. The CIO will ensure the needs of users with disabilities are identified when GSA procures, develops, maintains, or uses ICT. This responsibility includes determination of how users with disabilities will perform the functions supported by the ICT and how the ICT will be developed, installed, configured, and maintained to support users with disabilities. The CIO will:
  - 1.7.1. Establish the GSA Section 508 Program and appoint a GSA Section 508 Program Manager (hereinafter 'GSA 508 PM'). Ensure the PM has the authority and resources to implement agency-wide accessibility policies, monitor compliance, and provide technical assistance regarding Section 508 and ICT accessibility.

- 1.7.2. Implement Section 508 policy management and procedures.
- 1.7.3. Raise levels of agency awareness about accessibility and Section 508 requirements and be the champion for the Section 508 efforts.
- 1.7.4. Oversee and ensure that all GSA organizations' ICT meets and maintains accessibility requirements, unless an exception has been formally approved by the CIO, or GSA 508 Program Manager.
- 1.7.5. Ensure accessibility requirements are specified in solicitations for ICT, and that accessibility is a factor in award decisions. GSA solicitations shall request Accessibility Conformance Reports (ACR) based on the current version of the Voluntary Product Accessibility Template™ (VPAT). This may include conducting a data call on organizations' solicitations to identify where improvements are needed. GSA software and website design and development practices must include accessibility throughout the lifecycle, unless an exception is approved by the CIO or GSA 508 Program Manager (See Section 7 below).
- 1.7.6. Oversee and monitor the conformance to the new Section 508 Standards for GSA's intranet, internet, and other ICT products. Work with the S/SO/R to improve the conformance level.
- 1.7.7. Publish the [accessibility statements](#) on the agency website to provide helpful and actionable information for the general user, publicly available organizational policies or procedures on digital accessibility.
- 1.7.8. Publish on the agency website the public feedback mechanism that allows members of the public to report accessibility problems with agency websites and digital services to the agency's Section 508 program as well as relevant implementation teams, and instructions for filing a complaint alleging a violation of Section 508; and
- 1.7.9. Support for how to file [Section 508 complaints](#).
- 1.7.10. Collect and report agency ICT accessibility data according to statute:
  - 1.7.10.1. Annually in accordance with [29 U.S.C. §794d-1, which was codified in 2023, after the last GSA directive/policy update. Reports on accessibility of electronic information to individuals with disabilities.](#)

- 1.7.10.2. Every two years to the Department of Justice in accordance with Section 508 of the Rehabilitation Act of 1973, as amended, [29 U.S.C. 794d. Electronic and Information Technology](#).

**Signature**

/S/  
David Shive  
Chief Information Officer  
Office of GSA IT

3/30/2026  
Date

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# 1. Policy

- 1.1. As mandated by [Section 508 of the Rehabilitation Act of 1973 \(as amended\)](#), and the [U.S. Access Board's ICT Final Standards and Guidelines](#), GSA will make ICT accessible to individuals with disabilities and accommodate the needs of employees and program participants.
- 1.2. GSA will identify the needs of users with disabilities when it procures, develops, maintains, or uses ICT. This will include a determination of how individuals with disabilities will perform the functions supported by the ICT and how the ICT will be developed, installed, configured, and maintained to support individuals with disabilities.
- 1.3. GSA will centrally manage the accessibility status of ICT, including reports, data calls, audits, exceptions, and complaints.
- 1.4. Failure to meet Section 508 obligations could result in unlawful discrimination against individuals with disabilities.

# 2. General Exception

- 2.1. There are situations where ICT may be exempt from complying with Section 508 Standards. GSA will adopt the [US Access Board's final Guidelines](#) for identifying and management of the Exceptions. An exception will not alleviate the need to provide an alternate accessible format when requested. ICT prior to January 18, 2018 (referred to as legacy ICT) that conformed to the Original 508 Standards is not required to be modified to comply with the Revised 508 Standards. This provision only applies to the component(s) or function(s) of the ICT previously determined to be compliant, and only to the extent such components of the ICT are not altered. To request an exception, the ICT Owner shall follow the procedures as outlined in the [GSA 508/Accessibility Program Management Office's guidelines for Exceptions](#). The ICT Owner will provide access to the information and data by alternative means and meet the disabled individual's needs. The ICT Owner will identify in advance the needs of people with disabilities affected by each exception and implement a plan to meet these needs through alternative means.

### 3. Section 508 Discrimination Complaints

- 3.1. The Office of Civil Rights (OCR) investigates and processes complaints alleging discrimination concerning Section 508. GSA OCR can be reached at:

Office of Civil Rights  
Complaint Processing Branch  
1800 F Street, N.W.  
Room G224  
Washington, DC 20405  
Central Office Main Line: (202) 501-0767  
Speech-to-Speech Relay Service: 1-800-898-0740  
Email: [eeo@gsa.gov](mailto:eeo@gsa.gov)

### 4. Accessibility Statement on GSA Websites

- 4.1. GSA intranet and internet websites will include a link for [accessibility statement](#) that represents GSA's commitment to Section 508 and accessibility.

### 5. Definitions

- 5.1. **Accessibility Management.** The practice of ensuring equal access to and use of all ICT resources by individuals with and without disabilities. Accessibility management must be addressed during the planning, development, maintenance, and acquisition of all ICT resources to ensure that all ICT resources conform to the Section 508 Standards, and US Access Board's Final Guidelines.
- 5.2. **Agency Official Communications.** All electronic content for Official Communication shall conform to the applicable accessibility requirements when such content constitutes official business and is communicated by an agency through one or more of the following:
- 5.2.1. An emergency notification;
  - 5.2.2. An initial or final decision adjudicating an administrative claim or proceeding;
  - 5.2.3. An internal or external program or policy announcement;
  - 5.2.4. A notice of benefits, program eligibility, employment opportunity, or personnel action;

- 5.2.5. A formal acknowledgement of receipt;
  - 5.2.6. A survey questionnaire;
  - 5.2.7. A template or form;
  - 5.2.8. Educational or training materials;
  - 5.2.9. Any web content; or
  - 5.2.10. Some communication materials (ICT Products) may qualify for an Exception to the extent allowed by Law.
- 5.3. Assistive Technology. Any ICT product whether acquired commercially, modified, customized, or internally developed, which is commonly used to increase, maintain, or improve the functional capability of individuals with disabilities.
- 5.4. Electronic Content. Information and data, as well as the encoding that defines its structure, presentation, and interaction.
- 5.5. Information and Communications Technology (ICT). Any information technology, equipment, or interconnected system or subsystem of equipment for which the principal function is the creation, conversion, duplication, automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, reception, or broadcast of data or information. Examples of ICT are:
- 5.5.1. Electronic content;
  - 5.5.2. Software;
  - 5.5.3. Applications;
  - 5.5.4. Documents;
  - 5.5.5. Web based Intranet or Internet information and applications;
  - 5.5.6. Multimedia (including audio, video, and pictures);
  - 5.5.7. Telecommunications products;
  - 5.5.8. Computers and ancillary equipment;
  - 5.5.9. Information kiosks and transaction machines;

- 5.5.10. Building Access ancillaries;
  - 5.5.11. Information technology services;
  - 5.5.12. Office machines which copy, scan, and fax documents; and
  - 5.5.13. Other related resources as defined by the GSA Administrator, Accessibility Law and Regulation.
- 5.6. Information Technology. As defined in the FAR [subpart 2.1](#), any equipment or interconnected system(s) or subsystem(s) of equipment that is used in the automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by the agency.
- 5.6.1. The term "information technology" includes computers, ancillary equipment (including imaging peripherals, input, output, and storage devices necessary for security and surveillance), peripheral equipment designed to be controlled by the central processing unit of a computer, software, firmware and similar procedures, services (including support services), and related resources.
  - 5.6.2. The term "information technology" does not include any equipment that:
    - 5.6.2.1. Is acquired by a contractor incidental to a contract; or
    - 5.6.2.2. Contains embedded information technology that is used as an integral part of the product, but the principal function of which is not the acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information.
- 5.7. Public Facing. The electronic content made available by an agency to members of the general public. Examples include, but are not limited to an agency website, blog post, or social media pages, applications, documents, data, and information.
- 5.8. Requiring Officials (also known as ICT Owner). The program manager or other government staff delegated with responsibility for developing ICT requirements.
- 5.9. Undue Burden or Unduly Burden(ed). To make the ICT conform to the new Section 508 Standards, it would cause significant difficulty or expense to

the agency, and/or it would alter required functionality of the ICT. When there is an undue burden, an alternative means of access must be provided to individuals with disabilities. Determinations of undue burden and alternative means of access must be made consistent with the standards established in the Section 508 Standards and US Access Board's Final Guidelines.

- 5.10. Completed Voluntary Product Accessibility Template™ (VPAT) or Accessibility Conformance Report (ACR). The vendor's self-representation of their product(s) or service(s) conformance to the Section 508 Standards and US Access Board's Final Guidelines.