

THE SECRETARY OF VETERANS AFFAIRS WASHINGTON

July 29, 2022

The Honorable Robert P. Casey, Jr. Chairman
Special Committee on Aging
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

Thank you for your June 6, 2022, cosigned letter to the Department of Veterans Affairs (VA) regarding VA's compliance with Section 508 of the Rehabilitation Act of 1973. I appreciate the opportunity to respond to your letter.

VA shares your view of how critical Section 508 compliance is, as we strive to provide the best support to all users of our websites, including the Nation's disabled Veterans. As you note, the VA Website Accessibility Act of 2019 requires the VA to report "A list of website, file, or web-based application (sic) that is not accessible to individuals with disabilities in accordance with Section 508 of the Rehabilitation Act of 1973." The enclosures provide information that you requested in your letter.

VA's web ecosystem is quite large. To address the reporting requirement, we based our Section 508 compliance report on the list of "websites" enumerated in our content management systems. This approach does not consider the fact that a small number of web pages receive the majority of visits by end users. Therefore, VA prioritized 508 compatibility efforts having the greatest impact by focusing on the web pages that receive the most visits. Among the top 1000 most used pages across the VA, 89% of the pageviews are served by either the modern VA.gov platform (49%) or the MyHealtheVet platform (32%); both receive outstanding accessibility compliance scores of 95% or higher.

Specifically, the Department invested in strong accessibility features for both platforms. By prioritizing the accessibility of these pages and tools, we can maximize our improvements and benefit more Veterans sooner. In future versions of our Section 508 compliance report, the Department will seek to match compliance reporting to the measures we believe best reflect the overall accessibility of VA's web presence (i.e., by taking into account the relative usage of the pages and tools).

The Honorable Robert P. Casey, Jr.

As VA continues to improve accessibility, we are digging deeper into the "usage graph" and addressing pages with fewer page views to increase compliance.

In addition to identifying specific web pages further down the usage graph, we are using the following additional approaches to improve our compliance:

- 1. Reducing duplicative content across 138 VA medical center sites by migrating them to the modernized VA.gov platform.
- 2. Ensuring consistency and accessibility across sites and enable editors to access only the content that they need to edit.
- 3. Conducting daily accessibility scans of high usage sites to alert production teams of any non-compliance within 24 hours at which time we take immediate steps to begin remediation.

While VA has made progress, there is still much more work to be done. For example, VA plans to employ the same approach with sites on VA's internal staff-facing intranet network. Implementing webpage usage statistics on our most critical intranet sites will allow more precise focus and prioritization. Until usage analytics are in place, our improved internal processes enable us to capture webpages that most directly impact employees. When employees encounter accessibility issues with websites, they are able to enter trouble tickets via YourlT (ServiceNow) where we have Tier 1 and Tier 2 support. This ServiceNow Tier support structure has processes in place to address employee needs and to focus remediation. To date, VA has resolved 1,138 tickets, for which 52 were incident related.

Other key elements of our remediation strategy are increasing our partnerships with VA Administrations to supplement their remediation activities through acquisitions, training, development methodologies and processes. We will leverage our Web Governance Board to establish and enforce standards for publishing and maintaining websites and applying technical expertise where needed.

As we continue to improve our websites, we also have made significant progress with kiosk accessibility. In May 2022, the national deployment of the Patient Check-In (PCI) web-based tool began to rollout. By September 2022, PCI will "go-live", indicating that it is available for every VISN to deploy for Veteran use. In the PCI redesign, accessibility was built-in using Web-Content Accessibility Guidelines (WCAG) 2.1, which addresses cognitive disabilities as a foundational part of its architecture. The application is regularly tested with disabled Veterans and accessibility experts, including on-site visits at our pilot sites, to ensure that the application works in context. Until implementation is complete, Veterans with accessibility needs may complete appointment check-ins by seeing a staff member. In addition, Veterans without mobile devices can receive assistance from a staff member.

Page 3.

The Honorable Robert P. Casey, Jr.

In closing, the Department stresses the importance of transparency in our efforts to ensure our websites are Section 508 compliant, and in all our work.

Thank you for your continued support of our mission.

Sincerely,

Denis McDonough

Enclosures