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Evidence You Can Sign: A Fixed-Fee Section 508 Conformance Assessment for One Public-Facing Service

Accessibility Modernization: test evidence against the Revised 508 Standards for a defined sample, defects in your own tracker, and remediation priced from real findings

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Executive Summary

Every federal agency must make the information and communication technology it develops, buys, maintains or uses accessible to employees and members of the public with disabilities. That is Section 508 of the Rehabilitation Act, and it has applied for decades. What has changed is the evidence. The annual governmentwide Section 508 assessment asks agencies how they test, how they track defects and how they fix them, and many 508 program managers find they cannot back their answers with records.

The gap is rarely a lack of goodwill. A public-facing service ships with an automated scan report that looked clean. A complaint arrives from a screen reader user who could not finish a form. A vendor's Accessibility Conformance Report says "Supports" for every criterion, and nobody can check it. The inspector general asks how the agency tests, and there is no written method to show.

This paper is for the Section 508 program manager who carries the assessment response, the system or program owner who funds fixes from the system's operations and maintenance budget, the CIO or digital services lead who answers for the result, and the contracting officer and COR who buy and accept the work. It describes Avalon Technology Services' Accessibility Modernization service, which starts with one engagement:

- **A fixed-fee Section 508 conformance assessment for one public-facing service.** One unclassified public website or web application, about 6 weeks. A property inventory and risk register, an automated scan of the whole property, a manual pass on an agreed sample using the DHS Trusted Tester process, defects exported into the agency's own tracker, and a prioritized remediation plan with a priced follow-on. The market band for a single website audit is \$20K to \$60K; Avalon's fixed-fee audit runs \$18K to \$35K for the base scope.
- **Conditional follow-ons, priced from the findings.** Remediation sprints, validation and Accessibility Conformance Report authoring, and pipeline checks and training, each quoted after the audit shows what is actually broken, never bundled blind.

The illustration later in this paper works through the cost model. The base case is a 20 pages sample over 6 weeks: 240 hours at a blended \$95 to \$165 an hour, or \$22.8K to \$39.6K, with a \$31K planning fee, far under the \$350,000 simplified acquisition threshold.

Avalon tests, documents and fixes. It does not certify Section 508 compliance, because no certifying body exists, and the conformance claim stays with the agency.

Why Accessibility Evidence Falls Short

Any two of these phrases in one meeting usually mean the agency has an evidence problem, not only a code problem.

What the program says	What it usually means
"Our assessment answers were mostly 'ad hoc.'"	No written test method, no defect tracking, no retest records
"We have one tester and a two-thousand-item backlog."	Findings were never collapsed into patterns or ranked by risk
"Every vendor VPAT we get says 'Supports' for everything."	Nobody on staff has time to test the vendor's claim
"The IG asked how we test and we didn't have an answer."	Testing happens, but the evidence does not survive
"We bought an overlay widget and the complaints didn't stop."	The underlying code still fails; a script on top does not change that
"A JAWS user couldn't finish the application."	A blocking defect sits on a high-traffic path

Why Scans Alone Do Not Close the Gap

- **Automated tools catch only a fraction of failures.** Reading order, meaningful link text, focus management and error recovery need a person with a keyboard and a screen reader.
- **Sampling is undefined.** Without an agreed sample, nobody can say what the results cover, and the next audit cannot be compared with this one.
- **Findings stay as instances.** A missing label on a shared form component shows up four hundred times. Fixed once in the component, it closes four hundred findings.
- **Remediation is bought before the audit.** A blind remediation price either pads for the unknown or runs out halfway.

- **Modernization carries old debt forward.** The Revised 508 Standards protect unaltered legacy content, but altering it removes that safe harbor, so a redesign without testing ships new violations.

The Standards and the Calendar

Driver	What it says	What it means for this engagement
Section 508, Rehabilitation Act (29 U.S.C. § 794d)	Federal ICT must be accessible to employees and members of the public with disabilities	The obligation the audit tests against
Revised 508 Standards, 36 CFR Part 1194 (2017 refresh, effective January 18, 2018)	Incorporates WCAG 2.0 Level A and AA for web content, documents and software	The legal baseline for every finding
WCAG 2.1 and 2.2 Level AA (W3C)	Current W3C guidance with added criteria for mobile, low vision and cognitive needs	Tested where agency policy sets it, and reported as a separate delta, not as the legal standard
Annual governmentwide Section 508 assessment (29 U.S.C. § 794d-1)	Agencies report on testing, remediation, tracking and training; GSA runs the program through section508.gov	The test records and defect register are the evidence those answers need
DHS Trusted Tester process and the ICT Testing Baseline	The government's own manual test method and baseline	The method the audit follows, so results are comparable across agencies
FAR Part 39	ICT the government buys must meet the 508 standards unless an exception applies	Acceptance testing and ACR review on contractor deliverables
21st Century IDEA Act (2018) and the U.S. Web Design System	Public websites must be accessible, consistent and mobile-friendly	USWDS components are a sound base, but an implementation still needs testing

OMB M-24-08, Strengthening Digital Accessibility and the Management of Section 508, was issued in December 2023 and set expectations for program managers, accessibility statements and lifecycle integration. Agencies should confirm how they apply it today. One more point matters to security staff: Section 508 is a separate compliance track from security authorization. No NIST SP 800-53 control implements it, and accessibility evidence is not ATO evidence.

What the Engagement Does

The engagement covers one named public website or web application and works in the agency's own environments, repositories and defect tracker.

Step	Activities
Inventory and triage	Catalog the property's templates, key user paths and linked documents; rank by traffic, mission criticality, complaint history and legal exposure; agree and document the test sample
Automated scan	Open-source tools (axe-core, ANDI, Lighthouse) across the whole property to find repeatable failures quickly
Manual Trusted Tester pass	The agreed sample, typically 15 to 30 pages or screens: keyboard-only operation, focus order, contrast, forms and errors, multimedia captions, and screen reader checks
Defect register	Each failure mapped to a WCAG success criterion and Trusted Tester test condition, collapsed into unique patterns and exported to Jira, GitHub Issues or Azure DevOps
Remediation plan	Patterns ranked by user impact and effort, component-level fixes separated from page-level fixes, and a firm-fixed-price quote for the follow-on

Testing to the Right Standard

The audit tests to the Revised 508 Standards, which means WCAG 2.0 Level AA. Where agency policy or the solicitation sets WCAG 2.1 or 2.2 AA, the added criteria are tested too, and the report shows them in a separate column so the 508 PM can see the legal finding and the policy finding apart. Sampling follows the W3C evaluation methodology (WCAG-EM), so the report states exactly what was tested and when.

Conformance is reported for the tested sample at that point in time, and for nothing beyond it.

Assistive Technology Coverage

Screen reader checks use NVDA on Windows and VoiceOver on macOS and iOS browsers, both available without a license. Where the agency requires JAWS or Dragon results, the agency provides the licensed seats or test machines, and the statement of work names the full assistive technology matrix before testing starts. Native mobile apps are out of scope; they belong to Avalon's separate Mobile Development service.

Deliverables

Deliverable	Format
Property inventory and risk register	XLSX register and a two-page prioritization brief
Conformance audit report	Report with legal-baseline and policy-delta findings for the tested sample
Defect export	Tickets in the agency's tracker, mapped to WCAG criteria and test conditions
Trusted Tester test evidence	Test-condition results retained as records
Prioritized remediation plan	Plan with pattern counts, effort ranges and a priced follow-on

Where the Engagement Stops

The entry engagement stops at the remediation plan. Visual redesign is UI/UX Design, a moderated usability study is User Testing and Feedback Analysis, and a rebuild is Application Modernization; each is a separate Avalon service. Fixes to commercial products the agency licenses are the vendor's obligation, pursued through the contract. Legal determinations, complaint representation, serving as the agency's 508 program manager, and remediation of a document backlog by volume are out of scope.

Evidence the 508 Program Manager Can Use

The value of the engagement is evidence that holds up when someone asks how it was produced.

Who asks	What the engagement gives them
Annual assessment data call	A written test method, a dated sample, a defect register with status and a remediation plan with owners
Release or launch gate	A conformance report for the tested sample, showing what passes and what remains
Complaint or IG question	Test records that show what was tested, how and when, for agency counsel to use
Contracting officer	An agency-side test method for checking a vendor's ACR claims against the product

Accurate	Not accurate
Documented conformance status against the Revised 508 Standards for the tested sample	Certified 508 compliant
Remediation of identified failures, with retest evidence	Guaranteed compliance
Test evidence against a defined method and sample	Conformance beyond the tested sample or date
An input to the agency's own conformance claim	Part of an ATO or a security authorization

Overlay scripts deserve a direct word. A widget that adjusts a page in the browser does not make the underlying code conform, and screen reader users often turn overlays off. The audit tests the code the agency owns, with any overlay disabled, and the plan fixes that code.

How an Engagement Runs

Phase	Timing	What happens
0: Kickoff and access	Week 1	Points of contact named, environments, repository and tracker access, test accounts for every role, sample method agreed in writing
1: Inventory and triage	Week 2	Templates and paths cataloged, risk ranking, test sample selected
2: Conformance audit	Weeks 3–5	Automated scan of the property and manual Trusted Tester pass on the sample
Plan and readout	Week 6	Defect export, remediation plan, priced follow-on and readout
3–5: Remediation, validation and ACR, sustainment (separate, conditional)	About 8–20 weeks	Two-week remediation sprints, retest, conformance report and ACR on the ITI VPAT template, pipeline checks and role-based training

A single property typically runs 8 to 12 weeks end to end when remediation follows directly. The audit is Phases 0 to 2 only, bought as a standalone firm-fixed-price task. Remediation is quoted from the actual findings, then validation confirms what was fixed with the same method.

What the Agency Provides

- A sponsor (the system owner or 508 PM) with authority to decide what is remediated, converted or retired.
- Non-production access and test accounts for every user role in scope. The audit holds until authenticated access exists, because testing only what is reachable produces a misleading report.
- Security onboarding started at award. Network and badge access can take weeks, so it goes in the schedule, not in a surprise.

- Prior audits, complaint logs, existing ACRs and design system documentation.
- Developer time for follow-on remediation, roughly 4 to 8 hours a week per team for pull request review.

What Is Not Included

Included	Separate work
One public website or web application	A portfolio of properties, or a native mobile app
Inventory of linked documents with a remediate, convert or retire recommendation	Document remediation by page volume
A priced remediation plan	Remediation, unless bought as the follow-on
Unclassified systems	Classified environments or cleared on-site work

How Avalon Staffs It

Avalon takes one engagement at a time, works business hours, and works on unclassified systems only. Avalon's founder leads the engagement. The accessibility test lead is named personnel, hired or subcontracted for the engagement and listed in the proposal with a résumé. Avalon has no past federal engagements under this service. FAR 15.305 says an offeror without a record of past performance may not be evaluated favorably or unfavorably on that factor; what protects the program is a named tester, a fixed price, a written sample and a small first engagement.

Requirement	How it is handled
Accessibility test lead	Named personnel holding a current DHS Trusted Tester certification, listed in the proposal; IAAP credentials where the agency asks for them
Remediation engineers	Front-end engineers named before any remediation follow-on is bid
Civilian or DoD access	Named personnel whose investigation level matches the agency's requirements, as a condition of the engagement
Tools and assistive technology	Open-source test tools, NVDA and VoiceOver; licensed tools such as JAWS run on agency-provided seats; Avalon resells nothing
Insurance and contract vehicles	Any coverage the solicitation requires is a condition of award; Avalon does not hold a GSA Schedule or a governmentwide contract today

Key personnel substitution requires CO approval. Reports, registers, test records and code delivered under the engagement belong to the agency, with data rights as the contract specifies.

Pricing and How to Buy

Engagement	Market-norm range	Avalon
Single public website audit, 20–30 sample pages	\$20K–\$60K	Firm fixed price; \$18K–\$35K for the base scope; illustrative \$31K
Authenticated application audit, multiple roles	\$40K–\$120K	Firm fixed price against a named screen and role count
Rapid public-page scan	Not a standard band	Fixed fee under the \$15,000 micro-purchase threshold; illustrative \$5.7K–\$9.9K
Remediation sprints	\$95–\$165/hr blended	Conditional follow-on, priced from the audit's findings
ACR authoring on the ITI VPAT template	\$4K–\$12K per product	Conditional follow-on after validation
Training	\$2.5K–\$8K per session	Conditional follow-on

The audit sits under the \$350,000 simplified acquisition threshold and can be bought as an open-market purchase. A rapid public-page scan fits under the micro-purchase threshold as a paid discovery step. Larger work can be subcontracted to Avalon by a prime. Avalon does not hold a GSA Schedule or a governmentwide contract today, and it does not resell software, assistive technology or licenses.

Accessibility fixes to a fielded system are usually funded from that system's operations and maintenance budget, which makes a six-week fixed-price audit a natural July-to-September purchase. Prices are fixed against one named property, a written sample size, a named role count and assistive technology matrix, and a dated dependency schedule. Compliance work is never priced on a share of outcomes.

Illustration: One Public Website, Six Weeks

The figures below are a planning illustration for one representative unclassified public website. They are not a quote and not a result from any engagement.

Labor Loading

The test lead works at one-quarter time during kickoff and inventory and full time during the audit and the plan. The project manager works at one-quarter time throughout. All hours price at the blended \$95 to \$165 an hour band, a market-norm range for small-business accessibility work.

Phase	Base weeks	Test lead	Project manager
Kickoff and inventory	2	0.25 FTE	0.25 FTE
Conformance audit	3	1.0 FTE	0.25 FTE
Plan and readout	1	1.0 FTE	0.25 FTE
Total hours	6	180	60

What the Engagement Costs

Scope	Weeks	Hours	Rate-band range	Planning fee
Base: public website, 20 pages	6	240	\$22.8K–\$39.6K	\$31K
A: public website, 30 pages	7	290	\$27.6K–\$47.9K	\$38K
B: authenticated application, 40 screens	10	410	\$39.0K–\$67.7K	\$53K
C: rapid public-page scan	About 2	60	\$5.7K–\$9.9K	Under \$15K

The base case is 240 hours, or \$22.8K to \$39.6K, with a \$31K planning fee at the midpoint. That sits inside the \$20K to \$60K website band and inside Avalon's \$18K to \$35K audit price, but the top of the rate band does not: the base scope fits \$35K only at about \$146 an hour or less, which is why the statement of work fixes the sample at 20 pages. A 30-page sample with a four-week audit runs \$27.6K to \$47.9K. An authenticated application with 40 screens and several roles runs \$39.0K to \$67.7K over 10 weeks, near the floor of the \$40K to \$120K application band, because every role multiplies manual testing.

Why Remediation Is Quoted Afterward

Remediation cost depends on unique defect patterns, not raw instances, and on how many sit in shared components. Nobody knows either number before the audit. At the same rates, one two-week sprint with 2 engineers is 160 hours, or \$15.2K to \$26.4K; the audit tells the agency how many sprints the findings need and which fixes in shared components close the most defects first. The same logic applies to documents: triage decides what to retire or convert before anyone pays per page to fix it.

Common Pitfalls

Pitfall	How to avoid it
The sample grows mid-audit	Name the property, sample size, roles and assistive technology matrix in the statement of work; additions by priced modification
A bottomless document backlog	Triage first; enumerate page counts for any remediation; never "as needed"
Compliance oversell	Report the tested sample at a point in time; no "certified" or "guaranteed" language
Agency-side access delays	Access, accounts and onboarding written as dated dependencies
Testing only what is reachable	Hold the audit until every in-scope role has a test account
Commercial product dead ends	Document the failures and route them to the vendor through the contract and its ACR
Overlay entanglement	Test with overlays disabled and fix the underlying code

Conclusion and Next Step

Most accessibility programs are not short on intent. They are short on evidence: what was tested, how, against which standard, and what is still broken.

The natural first step is the fixed-fee Section 508 conformance assessment: one public-facing service, about six weeks, under the simplified acquisition threshold, ending in a

risk register, a conformance report for a defined sample, defects in the agency's own tracker and a priced remediation plan. To discuss a service, contact Avalon Technology Services at contact@AvalonTechServices.com.

Appendices

Appendix A: Glossary

ACR

Accessibility Conformance Report: a product's conformance statement, usually written on the ITI VPAT template.

Alteration

A change to legacy ICT that removes its safe harbor under the Revised 508 Standards.

ICT Testing Baseline

The federal baseline of tests used to check conformance with the Revised 508 Standards.

Trusted Tester

The DHS manual test process and the certification for testers who use it.

WCAG

Web Content Accessibility Guidelines from the W3C; version 2.0 Level AA is the Section 508 baseline.

WCAG-EM

The W3C methodology for selecting and documenting a representative evaluation sample.

Appendix B: Illustration Assumptions

All values are planning assumptions for one representative unclassified public website. None is drawn from a specific agency, a real system or a completed engagement.

Assumption	Value	Basis
Property	One public website; 20-page manual sample	Planning assumption
Phases	Kickoff 1, inventory 1, audit 3, plan 1 week	Inside knowledge base phase ranges
Staffing	Test lead 0.25 then 1.0 FTE; PM 0.25 FTE	Knowledge base delivery model
Rate	\$95–\$165 an hour blended	Market-norm small-business band
Rapid scan	60 hours	Planning assumption
Price check	Base fee \$31K	Inside \$20K–\$60K and \$18K–\$35K; under the SAT

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