Login.gov Accessibility Conformance Report (ACR) Revised Section 508 Edition

(Based on VPAT® Version 2.4Rev)

Name of Product/Version

Identity Verification (IdV)

Report Date

March 3, 2023

Product Description

Login.gov is a secure sign in service used by the public to sign in to participating government agencies. Some agencies require an applicant to verify their identity. Identity verification is the process where a user proves their identity by uploading documents and information to Login.gov. Login.gov only confirms that the applicant is who they claim to be and does not make any determination of eligibility for agency services.

Contact Information

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Notes

This report only covers the identity verification process, and does not include the authentication process. The report for the authentication process is available as a [PDF file](#) (Updated August 3, 2021).

Evaluation Methods Used

Login.gov used moderated and manual usability testing to determine accessibility compliance. The identity verification process was evaluated using these methods:

- **Cognitive disability study:** Moderated, remote usability testing with four participants who identify as having a cognitive disability
- **Blind disability study:** Moderated, remote usability testing with two participants who identify as blind
- **Automated, manual, and screen readers**
    - **Automated:** Used WebAIM Web Accessibility Evaluation Tool (WAVE) extension (Chrome 3.1.6) as an automated testing tool
    - **Manual, including automated:** Used Microsoft Accessibility Insights for Web (Chrome 2.35.0) as both an automated and manual testing tool to check for ~55 of the most common issues and an in-depth assessment of 23 areas
    - **Screen readers:** Used assistive technologies
        - Apple VoiceOver on a MacBook Pro with macOS Monterey 12.6
        - Apple VoiceOver on an iPhone 12 with iOS 16.2
        - NVDA 2022.3.2 on a Windows 11s laptop
        - In addition, the simulation environment included:
            - On a desktop, a mouse was disabled to simulate a keyboard-only navigation experience
            - On a desktop, a monitor was covered (or "curtain-ed") to simulate the environment of not having access to visual information; Also, on an iPhone, the curtain mode was enabled.

Evaluation limitations of each method

- **Cognitive disability and blind disability studies:** Both study samples are small; however, the trends are consistent among each set of participants. We will seek opportunities to broaden the sample size and diversity.
- **Screen readers:**
    - **The limitation of simulation:** The evaluator responsible for conducting the VPAT assessment is a sighted person. To mitigate this limitation, the evaluator also conducted sessions with two blind participants.
    - **The limitation of accessing a variety of screen readers:** Since the evaluator does not have access to a JAWS screen reader and an Android device with TalkBack this evaluation lacks representation of both technologies. To mitigate the JAWS issue, the evaluator conducted a session with a JAWS user.

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0	Level A (Yes) Level AA (Yes) Level AAA (No)
Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018	(Yes)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports**: The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially supports**: Some functionality of the product does not meet the criterion.
- **Does not support**: The majority of product functionality does not meet the criterion.
- **Not applicable**: The criterion is not relevant to the product.
- **Not evaluated**: The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

WCAG 2.0 Report

Tables 1 and 2 also document conformance with Revised Section 508:

- Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing
- Chapter 6 – 602.3 Electronic Support Documentation

Note: When reporting on conformance with the WCAG 2.0 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the WCAG 2.0 Conformance Requirements.

Table 1: Success Criteria, Level A

Notes: None

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A)	Partially supports	The website presents sufficient text alternatives for most instances of non-text content. Exception: One of the illustration images is read as "image," which does not provide sufficient description A resolution for the exception is tracked and planned.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Not applicable	The website does not contain prerecorded audio-only or video-only materials.
1.2.2 Captions (Prerecorded) (Level A)	Not applicable	The website does not contain prerecorded synchronized media.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Not applicable	The website does not contain prerecorded video content that requires audio description or media alternative.
1.3.1 Info and Relationships (Level A)	Partially supports	Most information, structure, and relations conveyed on the website are programmatically determined or available in text. Exceptions include ● The "Add your ID" file input component has state changes, which could confuse an assistive technology user. ● The "Zip code" field uses an <input type="tel"> element, which would include "telephone" in a screen reader announcement when it should not. Resolutions for exceptions are tracked and planned.
1.3.2 Meaningful Sequence (Level A)	Supports	The website content is presented in a meaningful and programmatically determined sequence.
1.3.3 Sensory Characteristics (Level A)	Supports	The website does not rely solely on sensory characteristics.

Criteria	Conformance Level	Remarks and Explanations
1.4.1 Use of Color (Level A)	Supports	The website does not use color as the only visual means of conveying information.
1.4.2 Audio Control (Level A)	Not applicable	The website does not contain audio that plays automatically.
2.1.1 Keyboard (Level A)	Supports	The functionality of website content is operable through a keyboard interface. Note: This criterion excludes any underlying function that requires input depending on the user's movement, e.g., taking pictures of a document with a mobile phone.
2.1.2 No Keyboard Trap (Level A)	Supports	The website does not include keyboard traps.
2.2.1 Timing Adjustable (Level A)	Supports	The website includes a mechanism to extend the time when a time limit is applicable and does not compromise security.
2.2.2 Pause, Stop, Hide (Level A)	Not applicable	The website does not include elements that move, blink, scroll, or auto-update.
2.3.1 Three Flashes or Below Threshold (Level A)	Not applicable	The website does not contain flashing content.
2.4.1 Bypass Blocks (Level A)	Supports	The website has a "Skip to main content" link, providing a mechanism to jump to the first element of the main content.
2.4.2 Page Titled (Level A)	Supports	The webpages have titles that describe topic or purpose.
2.4.3 Focus Order (Level A)	Supports	The website's components receive focus in a meaningful order.
2.4.4 Link Purpose (In Context) (Level A)	Supports	The purpose of each link can be determined from the link text alone or the link text together with its programmatically determined link context.

Criteria	Conformance Level	Remarks and Explanations
3.1.1 Language of Page (Level A)	Supports	The language of each webpage can be programmatically determined by HTML lang attribute.
3.2.1 On Focus (Level A)	Supports	The website's components do not initiate a change of context when receiving focus.
3.2.2 On Input (Level A)	Supports	The website components do not automatically cause a change of context on user input.
3.3.1 Error Identification (Level A)	Supports	When an input error is automatically detected, the error is identified and described in the text with multiple cues.
3.3.2 Labels or Instructions (Level A)	Partially supports	Most input fields are provided with a label or an instruction. Exception: The "How should we send a code?" content contains two radio buttons that do not include a legend label. While the radio buttons are located within the text section that explains the purpose of the radio buttons, the lack of a fieldset could impact a screen reader user. A resolution for the exception is tracked and planned.
4.1.1 Parsing (Level A)	Supports	The website uses semantically correct markup for interface elements. Note: Automated accessibility tests are implemented and enhanced to check for HTML markup validity, e.g., incomplete tag, invalid nesting, and duplicate attributes.
4.1.2 Name, Role, Value (Level A)	Supports	The website components have name, role, and value that can be programmatically determined.

Table 2: Success Criteria, Level AA

Notes: None

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Not applicable	The website presents sufficient text alternatives for most instances of non-text content. Exception: One of the illustration images is read as "image," which does not provide sufficient description A resolution for the exception is tracked and planned.
1.2.5 Audio Description (Prerecorded) (Level AA)	Not applicable	The website does not contain a prerecorded video that would require an audio description.
1.4.3 Contrast (Minimum) (Level AA)	Partially supports	The website visual presentation of text has a contrast ratio of at least 4.5:1.
1.4.4 Resize text (Level AA)	Supports	The website text can be resized without assistive technology up to 200 percent without loss of content or functionality.
1.4.5 Images of Text (Level AA)	Supports	The website uses text rather than images of text to convey information.
2.4.5 Multiple Ways (Level AA)	Supports	The website is primarily experienced in a sequential manner where the webpage is the result of, or a step in, a process. When applicable, the website provides links between webpages for users who need to start over or to update.

Criteria	Conformance Level	Remarks and Explanations
2.4.6 Headings and Labels (Level AA)	Partially supports	Most headings and labels are descriptive. Exception: The "How should we send a code?" content contains two radio buttons that do not include a legend label. While there is a text section that explains the purpose of the radio buttons, the lack of a fieldset could impact an assistive technology user.
2.4.7 Focus Visible (Level AA)	Partially supports	Most focusable elements on the website have a visible keyboard focus indicator. Exception: When JAWS users are not using the Auto Forms Mode, the virtual cursor outline may not create a consistent navigation experience when interacting with radio button content.
3.1.2 Language of Parts (Level AA)	Supports	The language of each content section is programmatically determined.
3.2.3 Consistent Navigation (Level AA)	Supports	The website provides consistent and repeatable navigation orders.
3.2.4 Consistent Identification (Level AA)	Partially supports	Most components and elements that have the same functionality within the website are identified consistently. Exception: A non-text illustration is not consistent with other text alternatives. A resolution for the exception is tracked and planned.
3.3.3 Error Suggestion (Level AA)	Supports	When an input error is automatically detected, and a suggestion is known, an error message is provided with a suggestion. Also, the message may provide a description of an error unless it compromises the security of the user.

Criteria	Conformance Level	Remarks and Explanations
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	Supports	The website does not contain financial transactions but does include a legal commitment (or an agreement) and sensitive data sharing. A required check or confirmation is available as a mechanism in a few instances when applicable.

Table 3: Success Criteria, Level AAA

Notes: While the VPAT 2.4 Rev 508 does not require Login.gov to meet Success Criteria (AAA), Login.gov strives to meet or beyond them when applicable.

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA) Revised Section 508 – Does not apply	Not applicable	The website does not contain prerecorded synchronized media that require sign language interpretation.
1.2.7 Extended Audio Description (Prerecorded) (Level AAA) Revised Section 508 – Does not apply	Not applicable	The website does not contain prerecorded synchronized media that require extended audio description.
1.2.8 Media Alternative (Prerecorded) (Level AAA) Revised Section 508 – Does not apply	Not applicable	The website does not contain prerecorded synchronized media that require media alternatives.
1.2.9 Audio-only (Live) (Level AAA) Revised Section 508 – Does not apply	Not applicable	The website does not contain live audio-only content that requires alternatives for time-based media.
1.4.6 Contrast (Enhanced) (Level AAA) Revised Section 508 – Does not apply	Not applicable	Most visual presentation of text has a contrast ratio of at least 7:1 and 4:5:1 for large text. Exceptions (Does not meet Level AAA) • An element that use Login.gov's primary color (Blue) for a non-bolded text have a contrast ratio of 5.14:1 on a white background • A hint text has a contrast ratio of 4.54:1 on a white background

Criteria	Conformance Level	Remarks and Explanations
1.4.7 Low or No Background Audio (Level AAA) Revised Section 508 – Does not apply	Not applicable	The website does not contain prerecorded audio-content that require low or no background audio.
1.4.8 Visual Presentation (Level AAA) Revised Section 508 – Does not apply	Supports	The website has a mechanism available to support text configuration.
1.4.9 Images of Text (No Exception) (Level AAA) Revised Section 508 – Does not apply	Not applicable	The website does not use images of text as pure decoration.
2.1.3 Keyboard (No Exception) (Level AAA) Revised Section 508 – Does not apply	Not applicable	All content, except one, is operable from the keyboard. Exception: The act of taking pictures of a document with a mobile depends on the path of the user's movement, not with a keyboard.
2.2.3 No Timing (Level AAA) Revised Section 508 – Does not apply	Not applicable	For security reasons, timed interaction is necessary. Login.gov ends a session when the user hasn't moved to a new page for a specific amount of time. In these instances, the website provides users to adjust the time when appropriate (2.2.1).
2.2.4 Interruptions (Level AAA) Revised Section 508 – Does not apply	Not applicable	The website contains an interruption that requires immediate action to preserve the security of the user, which is qualified as an "emergency" under the WCAG 2.0 criterion.
2.2.5 Re-authenticating (Level AAA) Revised Section 508 – Does not apply	Not applicable	For security reasons, the user's data is not saved after being logged out due to a period of inactivity.
2.3.2 Three Flashes (Level AAA) Revised Section 508 – Does not apply	Supports	The website does not contain anything that flashes more than three times in any one-second period.
2.4.8 Location (Level AAA) Revised Section 508 – Does not apply	Supports	A step indicator component is available, providing information about the user's location on the website.

Criteria	Conformance Level	Remarks and Explanations
2.4.9 Link Purpose (Link Only) (Level AAA) Revised Section 508 – Does not apply	Not applicable	Most links can be determined from the link text alone. Exception: A webpage has a "Learn more" link, which is not sufficient to be determined from the link text alone. A resolution for the exception is tracked and planned.
2.4.10 Section Headings (Level AAA) Revised Section 508 – Does not apply	Supports	The section headings are used to organize the content throughout the website.
3.1.3 Unusual Words (Level AAA) Revised Section 508 – Does not apply	Not Evaluated	While the website uses plain language, Login.gov has yet to evaluate and develop a mechanism for identifying unusual words.
3.1.4 Abbreviations (Level AAA) Revised Section 508 – Does not apply	Not evaluated	While the website uses plain language, Login.gov has yet to evaluate and develop a mechanism for identifying abbreviations.
3.1.5 Reading Level (Level AAA) Revised Section 508 – Does not apply	Not evaluated	While the website uses plain language, Login.gov has yet to evaluate and develop a mechanism for identifying reading level.
3.1.6 Pronunciation (Level AAA) Revised Section 508 – Does not apply	Not evaluated	While the website uses plain language, Login.gov has yet to evaluate and develop a mechanism for identifying pronunciation.
3.2.5 Change on Request (Level AAA) Revised Section 508 – Does not apply	Supports	The website content gives full control of changes of context.
3.3.5 Help (Level AAA) Revised Section 508 – Does not apply	Supports	The website provides context-sensitive help related to the function currently being performed.
3.3.6 Error Prevention (All) (Level AAA) Revised Section 508 – Does not apply	Supports	The website provides all three error prevention methods as safeguards, depending on the context: Reversible, Checked, and Confirmed.

Revised Section 508 Report

Notes: None

Chapter 3: Functional Performance Criteria (FPC)

Notes: For more detailed information regarding the remarks and explanations, contact Login.gov at partners@login.gov.

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partially supports	The website requests document capture or upload that is not usable for users without vision. The website contains alphanumeric characters in a few instances such as a one-time code, which could be challenging to memorize or parse with assistive technology.
302.2 With Limited Vision	Partially supports	The website requests document capture or upload that is not usable for users with limited vision. The website contains alphanumeric characters in a few instances such as a one-time code, which could be challenging to memorize or parse with assistive technology.
302.3 Without Perception of Color	Supports	In an instance when a meaning of color is communicated, it is adjoined with a descriptive text and/or icon to ensure perceivability and understandability.
302.4 Without Hearing	Supports	The website sends a one-time code, which Login.gov provides an option of receiving as a text message (SMS) instead of a phone call (voice). Note: The code is repeated several times to ensure understandability if the user chooses a phone call (voice) option.

Criteria	Conformance Level	Remarks and Explanations
302.5 With Limited Hearing	Supports	The website provides two options for receiving a one-time code: Text message (SMS) or Phone call (Voice). Note: The code is repeated several times to ensure understandability if the user chooses a phone call (voice) option.
302.6 Without Speech	Not applicable	The website does not require any speech to be used for input, control, or operation.
302.7 With Limited Manipulation	Not evaluated	Login.gov has yet to test with users with limited manipulation for this product.
302.8 With Limited Reach and Strength	Not evaluated	Login.gov has yet to test with users with limited reach and strength for this product.
302.9 With Limited Language, Cognitive, and Learning Abilities	Partially supports	Login.gov uses plain language throughout the webpages that helps make the website readable for all users. Exception: While users with cognitive disabilities were able to navigate and complete identity verification, there are aspects of the flow that are repetitive and confusing to these users. The flow is also longer than these users feel is appropriate. More work is needed to evaluate an identity verification flow that is simple and streamlined to follow.

Chapter 4: Hardware

Notes: Login.gov does not create hardware that transmits information or has a user interface. For this reason, the chapter has been omitted.

Chapter 5: Software

Notes: Login.gov does not contain platform software that has access to platform accessibility services. For this reason, the chapter has been omitted.

Chapter 6: [Support Documentation and Services](#)

Notes: While Login.gov provides support documents and services, it is considered a separate product entity since it overlaps with other products. For this reason, the chapter has been omitted.

What's next

Goal 1: Meet Conformance Level AAA Rating

Meet WCAG Levels A and AA, and applicable sections of the WCAG 2.0 AAA conformance level. Priorities include these:

- Improve contrast ratio in the visual presentation of text
- Determine each mechanism to evaluate for unusual words, abbreviations, reading level, and pronunciation

WCAG 2.0 conformance level AAA includes several criteria pertaining to language and multilingualism. By addressing certain functional and design elements, Login.gov will remove barriers preventing users from completing the identity verification process. Priorities include these:

- Continue to explore the possibility of adding additional languages beyond English, French (Canada) and Spanish (Mexico)
- Improve translations capabilities and proficiency

Goal 2: Usability Testing

A key aspect of building an inclusive Login.gov is incorporating direct public feedback in our research. Priorities include these:

- Regularly conduct usability testing of new features with persons who have disabilities
- Provide a variety of support options for identity verification including:
  - In person proofing (IPP)
  - Phone support for identity verification in addition to email support
- Discover challenges and gaps in the identity verification process for users who:
  - Are novice English speakers (ESL)
  - Are assistive technology users, such as those who use a braille display