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

(Based on VPAT® Version 2.5Rev)

Name of Product/Version

Identity Authentication

Report Date

May 15, 2024

Product Description

Login.gov is a secure sign-in service used by the public to sign in to participating government agencies.

- When creating an account, a user is required to create a password and select an authentication method.
- When signing in, a user is required to enter their password and authenticate with their selected method.

Contact Information

Email: partners@login.gov

Notes

This report only covers these pertaining to Identity Authentication

- Account creation, including failure pages and emails
- Account sign-in, including failure pages and emails
- Account deletion, including emails
- Account password reset, including emails

It does not include Identity Verification (IdV). The report for the IdV process is available as a [PDF file](#) and a [DOCX file](#).

Evaluation Methods Used

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

- **Cognitive disability study:** Moderated, remote usability testing with 7 participants with cognitive disabilities or difficulties
- **Blind disability study:** Moderated, remote usability testing with 2 participants who are blind and experienced with screen readers
- **Automated, manual, and screen readers**
    - **Automated:** Used WebAIM Web Accessibility Evaluation Tool (WAVE) extension (Chrome 3.2.4.4) as an automated testing tool
    - **Manual, including automated:** Used Microsoft Accessibility Insights for Web (Web@2.39.0) 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:** Assessed with these screen readers
        - Apple VoiceOver on a MacBook Pro with macOS 13.6
        - NVDA 2023.2 on a Windows 11s laptop

Evaluation limitations of each method

- **Cognitive disability study:** In this participant pool, the demographics did not include the following perspectives of these
    - Assistive technology: Beginner or intermediate users
    - Education: Have only a high school degree or equivalent
    - LGBTQ+
- **Blind disability study:** In this participant pool, the demographics did not include the following perspectives of these
    - Users with beginner screen reader proficiency
    - Windows Narrator users
    - Android TalkBack users
    - Refreshable braille display users
- **Automated, manual, and screen readers**
    - **The limitation of simulation:** The evaluator responsible for conducting the VPAT assessment with VoiceOver and NVDA is a sighted person. To mitigate this limitation, the evaluator also conducted sessions with 2 blind participants.

Login.gov continues to broaden the sample size and diversity in both cognitive and blind disability studies.

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 only be used in WCAG Level AAA criteria.

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)	Supports	The website presents sufficient text alternatives or figure captions for most instances of non-text content.
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)	Supports	Information, structure, and relations conveyed on the website are programmatically determined or available in text.
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)	Partially supports	Most instructions provided for understanding and operating content do not rely solely on sensory characteristics. Exception ● An email may include an instruction to "click the link below," which users with visual disabilities may find it difficult to locate content. A resolution for the exception is tracked and planned.

Criteria	Conformance Level	Remarks and Explanations
1.4.1 Use of Color (Level A)	Partially supports	The website does not use color as the only visual means of conveying information. When color is used to convey information, it is accompanied by a text or icon cue. Exception: An email message may contain a link. It uses a blue color; however, it is not underlined. This may prevent users with color deficiencies from perceiving it as a clickable link. A resolution for the exception is tracked and planned.
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, such as these: ● Scan and/or tap a QR code during an authentication method setup ● Interact with a user's browser modal window when prompted by an authentication method setup or sign-in
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.

Criteria	Conformance Level	Remarks and Explanations
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 the topic or purpose.
2.4.3 Focus Order (Level A)	Supports	The website 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 with its programmatically determined link context.
3.1.1 Language of Page (Level A)	Supports	The language of each webpage can be programmatically determined by the HTML lang attribute.
3.2.1 On Focus (Level A)	Supports	The website 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	The website input fields are provided with a label or an instruction.
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 does not contain synchronized media.
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)	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.
2.4.6 Headings and Labels (Level AA)	Partially supports	All website headings and labels except for one describe topic or purpose. In one instance, the page lacks a H1 heading to describe a purpose. A resolution for the exception is tracked and planned.
2.4.7 Focus Visible (Level AA)	Partially supports	Focusable elements on the website have a visible keyboard focus indicator. Note: When some 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.

Criteria	Conformance Level	Remarks and Explanations
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)	Supports	Components and elements that have the same functionality within the website are identified consistently.
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.
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 2.5 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.

Criteria	Conformance Level	Remarks and Explanations
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 presentations of text have 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
1.4.7 Low or No Background Audio (Level AAA) Revised Section 508 – Does not apply	Supports	The website does not contain prerecorded audio-content that requires 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 contains these ● Agency logos that include text as part, or all, of the logo ● Icon illustrations that include symbolic text characters to communicate a status Agency logos and icons are provided with a text alternative when appropriate.
2.1.3 Keyboard (No Exception) (Level AAA) Revised Section 508 – Does not apply	Not applicable	Most content is operable from the keyboard with several exceptions when a user opts into a path requesting a user's movement away from their keyboard ● Scan and/or tap a QR code ● Plug and/or activate a security key in a device port ● Insert and/or activate a physical PIV (personal identity verification card or CAC (command access card)

Criteria	Conformance Level	Remarks and Explanations
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 extend 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 to preserve user safety.
2.2.5 Re-authenticating (Level AAA) Revised Section 508 – Does not apply	Not applicable	For security reasons, the user's session activity 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	Not applicable	The website does not contain information about the user's location within the identity authentication. Note: During the identity verification, a step indicator component is included to help users know where they are in the process.
2.4.9 Link Purpose (Link Only) (Level AAA) Revised Section 508 – Does not apply	Not applicable	Most links can be identified from link text alone. When it is not, the purpose of a link can be determined by the link context (2.4.4)
2.4.10 Section Headings (Level AAA) Revised Section 508 – Does not apply	Partially supports	All section headings except for one are used to organize the content throughout the website. In one instance, the page lacks a H1 heading to describe a purpose. A resolution for the exception is tracked and planned.
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 develop an evaluation method for identifying unusual words.

Criteria	Conformance Level	Remarks and Explanations
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 develop an evaluation method 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 develop an evaluation method 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 develop an evaluation method 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	QR code: A user without a vision may experience difficulty locating the QR code on the screen. ● Authentication app page includes a QR code to scan. In this instance the page also provides another mode of operation to copy and enter without having to locate the QR code. ● Security key page includes a browser modal window with a QR code. Hints are provided to a browser to optimize the browser dialog experience. Text characters: The website contains numeric or 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	QR code: A user with limited vision may experience difficulty locating the QR code on the screen. ● Authentication app page includes a QR code to scan. In this instance the page also provides another mode of operation to copy and enter without having to locate the QR code. ● Security key page includes a browser modal window with a QR code. Hints are provided to a browser to optimize the browser dialog. Text characters: The website contains numeric or alphanumeric characters in a few instances such as a one-time code, which could be challenging to memorize or parse with assistive technology.

Criteria	Conformance Level	Remarks and Explanations
302.3 Without Perception of Color	Partially supports	When color is used to convey information, it is accompanied by a text or icon cue. Exception: An email message may contain a link. It uses a blue color; however, it is not underlined. This may prevent users with color deficiencies from perceiving it as a clickable link. A resolution for the exception is tracked and planned.
302.4 Without Hearing	Supports	During an authentication method setup, the website provides two options for receiving a one-time code: Text message (SMS) or voice message (Phone call). Note: The code is repeated several times to ensure understandability if the user chooses the voice message option. Alternatively, the website provides other method options for users to select instead of text or voice message.
302.5 With Limited Hearing	Supports	During an authentication method setup, the website provides two options for receiving a one-time code: Text message (SMS) or voice message (Phone call). Note: The code is repeated several times to ensure understandability if the user chooses the voice message option. Alternatively, the website provides other method options for users to select instead of text or voice message.
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

Criteria	Conformance Level	Remarks and Explanations
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: Users with cognitive disabilities or difficulties may encounter a barrier at these steps, which could prevent or impair them from continuing with identity authentication ● Create a password while meeting its length and strength requirements ● Select a multi-factor authentication (MFA) while making an informed decision on the level of security and usability

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.