Centers for Medicare & Medicaid Services
Center for Clinical Standards and Quality
Information Systems Group

Section 508 Compliance Checklist

Portable Document Format (PDF) Files

Version 2.0

12/02/2020

Certified Section
508 Compliant

Instructions

Complete this checklist for all PDF files that must be Section 508 compliant.

Instructions:

1. Type the full name of the document in the text box below.

   Document Name*:

2. Go to the first form field (requirement #1 Pass/Fail Status (All fields required*), and select an option (Pass, Fail, or N/A).
   Note: The status in the Pass/Fail Status column is required for all requirements.

3. Comments are mandatory for any requirements that fail. Comments are optional for any requirements that pass or that are N/A.

4. Press the **Tab** key to move from field to field.

5. Save the completed checklist in the following format (the date is the date of the compliance check):

   508CKL_Filename_YYYYMMDD

6. Provide this checklist to the stakeholder.

FYI: The requirement descriptions for most of the requirements display the Web Content Accessibility Guideline (WCAG), or success criterion, that applies to the requirement. WCAG 2.0 Level A and Level AA success criteria are incorporated by reference in the Federal regulations that govern Section 508. Consequently, the WCAG Level A and Level AA success criteria are in effect the Federal regulations for electronic documents. To learn more, see Understanding WCAG 2.0.

Section 508 Compliance Checklist
for PDF Files

Table 1 – Best Practices

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
1	Document Properties > Description "Application" or "PDF Producer" does not display "Adobe LiveCycle Designer".	**Status*:**	**Comments:**
2	Document Properties > Security > "Content Copying for Accessibility" displays "Allowed", If the statement is false, the security settings must be updated.	**Status*:**	**Comments:**
3	The Accessibility Full Check does not display **Scripts – Needs manual check** under the **Page Content** category. If the statement is false, a Web and applications checklist is required to validate the content.	**Status*:**	**Comments:**
4	Where no method exists to correct content so that it meets the requirements, an alternate version is provided. If the statement is false, contact your Section 508 program team for alternate content options.	**Status*:**	**Comments:**
5	Where the document links to or embeds another file, an appropriate checklist has been provided for each link or attachment.	**Status*:**	**Comments:**

Table 2 – Text Alternatives (Non-Text Content)

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
6	All images and form image buttons have appropriate, concise alternative text. (WCAG 1.1.1)	**Status*:**	**Comments:**
7	Images that do not convey content, are decorative, or with content that is already conveyed in text are changed to artifacts. (WCAG 1.1.1)	**Status*:**	**Comments:**
8	Equivalent alternatives to complex images are provided in context or on a separate (linked and/or referenced) page. (WCAG 1.1.1)	**Status*:**	**Comments:**
9	Images of text or that include text; e.g., logos, have the text as part of the description. (WCAG 1.1.1)	**Status*:**	**Comments:**
10	All images or objects in the document have the **Text Wrap** property set to **In Line with Text**. (WCAG 1.1.1)	**Status*:**	**Comments:**
11	Embedded multimedia is identified via accessible text. (WCAG 1.1.1)	**Status*:**	**Comments:**
12	Animated content has an alternative or is described in text. (WCAG 1.1.1)	**Status*:**	**Comments:**

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
13	Mathematical formulas have an alternative or are provided as text. (WCAG 1.1.1)	**Status*:**	**Comments:**

Table 3 – Time-Based Media

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
14	Where media content is present or embedded, the requirements in the Time-Based Media checklist pass. (WCAG 1.1.1 and 1.2.#)	**Status*:**	**Comments:**

Table 4 – Information and Relationships

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
15	**Yes** is displayed next to **Tagged PDF** under Document Properties > Description > Advanced. (WCAG 1.3.1 and 4.1.1)	**Status*:**	**Comments:**
16	Tags are used to structure content in a valid manner; e.g., a table is designated by a table tag). (WCAG 1.3.1 and 4.1.2)	**Status*:**	**Comments:**
17	Non-standard tags are mapped appropriately in the Role Map. (WCAG 1.3.1 and 4.1.2)	**Status*:**	**Comments:**

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
18	Tags are used appropriately to designate headings; i.e., i.e. <H1> - <H6>. (WCAG 1.3.1)	**Status*:**	**Comments:**
19	Heading tags are provided in appropriate sequence (<H1>, <H2>, <H3>, etc.). (WCAG 1.3.1)	**Status*:**	**Comments:**
20	Tags are used appropriately to structure Table of Contents lists (<TOC>, <TOCI>). (WCAG 1.3.1)	**Status*:**	**Comments:**
21	Tags are used appropriately to structure lists (a minimum of <L> and <LI> are used). (WCAG 1.3.1)	**Status*:**	**Comments:**
22	Tags are used and nested appropriately to structure sub-lists (a minimum of <L> and <LI> are used). (WCAG 1.3.1)	**Status*:**	**Comments:**
23	Tables are used for tabular data. (WCAG 1.3.1)	**Status*:**	**Comments:**
24	Data table headers are appropriately identified; e.g., TH for simple tables and the headers attribute for complex tables. (WCAG 1.3.1)	**Status*:**	**Comments:**

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
25	Data cells are associated with their headers (ex. scope for simple tables or headers and IDs for complex tables). (WCAG 1.3.1)	**Status*:**	**Comments:**
26	RowSpan or ColSpan is used appropriately for merged cells. (WCAG 1.3.1)	**Status*:**	**Comments:**
27	Tables are not used to construct layout. Where tables are used for layout purposes, and not data, all table tags are removed from the Tags structure. (WCAG 1.3.1)	**Status*:**	**Comments:**
28	Form input elements have tool tips that identify their purpose and match the associated text label. (WCAG 1.3.1)	**Status*:**	**Comments:**
29	Related form elements and elements with multiple labels are grouped appropriately; e.g., group name is identified as part of the tool tip of the element; radio buttons have the same name. (WCAG 1.3.1)	**Status*:**	**Comments:**

Table 5 – Meaningful Sequence

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
30	The reading and navigation order (determined by Show/Hide > Navigation Panes > Tags) is logical and intuitive. (WCAG 1.3.2)	**Status*:**	**Comments:**

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
31	All meaningful content appears in the Tags pane. (WCAG 1.3.2)	Status*:	Comments:
32	Vital content from a header, footer or watermark is provided in the document. (WCAG 1.3.3)	Status*:	Comments:
33	Content that is repetitive or decorative is changed to an artifact. (WCAG 1.3.4)	Status*:	Comments:

Table 6 – Sensory Characteristics

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
34	Instructions do not rely upon shape, size, or visual location; e.g., "Click the square icon to continue" or "Instructions are in the right-hand column." (WCAG 1.3.3)	Status*:	Comments:
35	Instructions do not rely upon sound; e.g., "A beeping sound indicates you may continue." (WCAG 1.3.3)	Status*:	Comments:

Table 7 – Use of Color

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
36	Color is not used as the sole method of conveying content or distinguishing visual elements. (WCAG 1.4.1)	Status*:	Comments:
37	Color is not used as the sole method to distinguish links from surrounding text unless the luminance contrast between the link and the surrounding text is at least 3:1 and an additional differentiation; e.g., it becomes underlined, is provided when the link is hovered over or receives focus. (WCAG 1.4.1)	Status*:	Comments:
38	Non-text content; e.g., images, uses patterns to convey the same information as color. (WCAG 1.4.1)	Status*:	Comments:

Table 8 – Audio Control

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
39	A mechanism is provided to stop, pause, mute, or adjust volume for audio from multimedia or animation that automatically plays for more than 3 seconds. (WCAG 1.4.2)	Status*:	Comments:

Table 9 – Contrast (Minimum)

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
40	Text and images of text have a contrast ratio of at least 4.5:1. (WCAG 1.4.3)	Status*:	Comments:

Table 10 – Resize Text

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
41	The document is readable and functional when the text is set to re-flow. (WCAG 1.4.4)	Status*:	Comments:

Table 11 – Images of Text

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
42	The **Scanned Page Alert** does not appear when the document is opened and the Tools > Accessibility > Full Check > Document category does not say **Failed** for Image-only PDF or Tagged PDF. (WCAG 1.4.5)	Status*:	Comments:

Table 12 - Keyboard Accessible

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
43	All document functionality is available (receives focus and can be activated) using the keyboard, unless the functionality cannot be accomplished in any known way using a keyboard (e.g., free hand drawing). (WCAG 2.1.1)	Status*:	Comments:
44	All functionality of the content is operable without requiring specific timings for individual keystrokes. (WCAG 2.1.1)	Status*:	Comments:
45	Links are properly structured using the <Link> tag with a nested <Link-OBJR> tag. (WCAG 1.3.1, 2.1.1, and 4.1.2)	Status*:	Comments:
46	Keyboard focus is never locked or trapped at one particular document element. The user can navigate to and from all navigable elements; e.g., embedded objects, using only a keyboard. (WCAG 2.1.2)	Status*:	Comments:

Table 13 – Enough Time

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
47	If a page or application has a time limit, the user is given options to turn off, adjust, or extend that time limit. This is not a requirement for real-time events (e.g., an auction), where the time limit is absolutely required, or if the time limit is longer than 20 hours. (WCAG 2.2.1)	Status*:	Comments:

Filename*:

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
48	Automatically moving, blinking, scrolling, or auto-updating content (ex. multimedia, animation, etc.) that lasts longer than 5 seconds can be paused, stopped, or hidden by the user. Moving, blinking, or scrolling can be used to draw attention to or highlight content as long as it lasts less than 5 seconds. (WCAG 2.2.2)	Status*:	Comments:

Table 14 – Seizures

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
49	No page content flashes more than 3 times per second unless that flashing content is sufficiently small and the flashes are of low contrast and do not contain too much red. (WCAG 2.3.1)	Status*:	Comments:

Table 15 – Navigable

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
50	The document has a meaningful title indicating its purpose under Document Properties > Description > **Title**, and Document Properties > Initial View > Window Options > Show is set to **Document Title**. (WCAG 2.4.2)	Status*:	Comments:
51	The navigation order of links, form elements, etc. is logical and intuitive. (WCAG 2.1.1 and 2.4.3)	Status*:	Comments:

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
52	Keyboard focus moves to and returns from elements appropriately (ex. the opening or appearance and closing of dialogs). (WCAG 2.4.4)	Status*:	Comments:
53	The purpose of each link (or form image button) can be determined from the link text alone, or from the link text and its context; e.g., surrounding paragraph, list item, table cell, or table headers. (WCAG 2.4.4)	Status*:	Comments:
54	Links (or form image buttons) with the same text that go to different locations are readily distinguishable. (WCAG 2.4.4)	Status*:	Comments:
55	Page headings and labels for form and interactive controls are informative. Avoid duplicating headings; e.g., "More Details," or label text; e.g., "First Name," unless the structure provides adequate differentiation between them. (WCAG 2.4.6)	Status*:	Comments:
56	It is visually apparent which element has the current keyboard focus (i.e., as you tab through the page, you can see where you are).	Status*:	Comments:

Table 16 – Readable

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
57	Document Properties > Advanced > Reading Options > Language displays the appropriate language for the document. (WCAG 3.1.1)	Status*:	Comments:
58	The language of page content that is in a different language is identified through Review > Language > Set Proofing Language. (WCAG 3.1.2)	Status*:	Comments:

Table 17 – Predictable

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
59	When a page element receives focus, it does not result in a substantial change to the page, the spawning of a pop-up window, an additional change of keyboard focus, or any other change that could confuse or disorient the user. (WCAG 3.2.1)	Status*:	Comments:
60	When a user inputs information or interacts with a control, it does not result in a substantial change to the page, the spawning of a pop-up window, an additional change of keyboard focus, or any other change that could confuse or disorient the user unless the user is informed of the change ahead of time. (WCAG 3.2.2)	Status*:	Comments:

Table 18 – Input Assistance

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
61	Required form elements or form elements that require a specific format, value, or length provide this information as a text description. (WCAG 3.3.1 and 3.3.2)	Status*:	Comments:
62	If utilized, form validation errors are presented in an efficient, intuitive, and accessible manner. The error is clearly identified, quick access to the problematic element is provided, and user is allowed to easily fix the error and resubmit the form. (WCAG 3.3.1)	Status*:	Comments:
63	Sufficient labels, cues, and instructions for required interactive elements are provided at the beginning of the form or set of fields via instructions, examples, and/or properly positioned form labels. Note: Related fields need to provide a group name, example "Gender: Female". (WCAG 3.2.2)	Status*:	Comments:
64	If an input error is detected, provide suggestions for fixing the input in a timely and accessible manner. (WCAG 3.3.3)	Status*:	Comments:
65	If the user can change or delete legal, financial, or test data, the changes/deletions can be reversed, verified, or confirmed. (WCAG 3.3.4)	Status*:	Comments:

Table 19 - Additional Items

#	Requirement	Pass/Fail Status (All fields required*)	Comments (Required only if Status is Fail)
66	The Accessibility Checker Inspection Results shows no accessibility issues found.	Status*:	Comments:
67	The document has been reviewed in Print Preview as a final check. **Note**: Ensure you update the TOC following a Print Preview as a Print Preview updates all hyperlinks in the document and resets the page number hyperlinks.	Status*:	Comments:

Table 20 - Additional Comments and Recommendations

Additional Comments and Recommendations
Comments:

Note: The Technical Writer or Section 508 expert certifies that the checked document is Section 508 compliant as of the date of transmission to the stakeholder. Any changes made to the checked document after transmission to the stakeholder may render the document non-compliant for Section 508. In case of changes, return the document to the Technical Writer or Section 508 expert for additional review to ensure its continued compliance.