



Accessibility and Records Management Alignment

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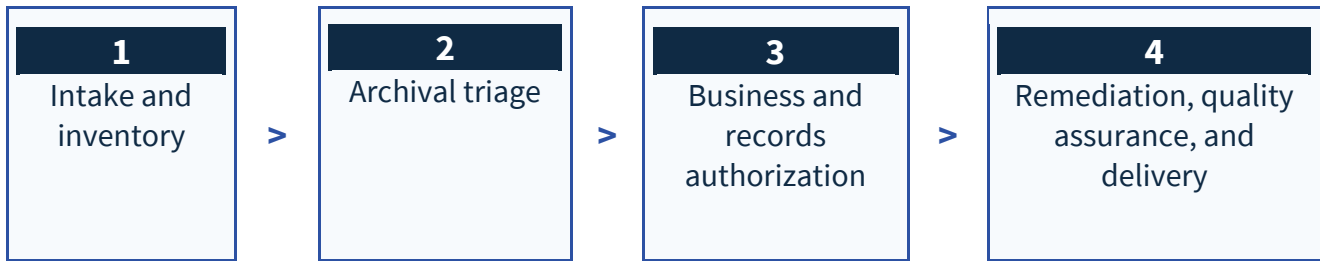
EXECUTIVE SUMMARY

Agencies with large document backlogs should not assume that every inaccessible file belongs in the remediation queue. A stronger enterprise model aligns accessibility and records management at intake: inventory each document, determine whether it is still needed for current operations or public access, identify whether it is active, superseded, duplicated, or archival in nature, and authorize remediation only for content that retains operational, legal, or public-service value.

For federal agencies, this approach supports Section 508 requirements under 29 U.S.C. § 794d and the implementing accessibility standards at 36 CFR part 1194 [1, 2]. For state and local governments, it also aligns with the Department of Justice's Title II web accessibility rule, which provides a narrow exception for qualifying "archived web content" only when all specified conditions are satisfied [3, 4].

Revelo Software's e-508 platform operationalizes this model by making archival triage a formal decision point before remediation begins. Documents enter through secure intake and a centralized queue, where the platform's Archival Recommendation Score classifies them as Remediate, Review for Archival, or Recommend Archival. Agency personnel can then determine whether each document should be remediated, replaced, withdrawn, or referred to an authorized records official before incurring remediation costs. Documents approved for continued use proceed through separate OCR, pricing, authorization, remediation, quality-assurance, and delivery workflows, creating a traceable record of both the accessibility action and the underlying business decision. [5]

RECOMMENDED WORKFLOW



1. Intake and inventory

Capture documents from direct uploads, website scans, repositories, or iAccessible into a centralized queue. Record the source URL, content owner, operating unit, file type, creation and modification dates, known accessibility issues, and records category when available. Revelo Software's e-508 platform consolidates these documents into a secure, tenant-aware intake workflow for assessment, triage, pricing, authorization, and remediation.

2. Archival triage

e-508 applies the Archival Recommendation Score to classify each document as Remediate, Review for Archival, or Recommend Archival. The review considers whether the document supports a current service or transaction, remains the authoritative version, has been superseded or duplicated, and is retained primarily for historical or records-management purposes. For state and local governments, content should be treated as archived web content only when all conditions of the DOJ exception are satisfied; simply labeling or relocating a file as "archived" is insufficient. [3, 4]

3. Business and records authorization.

Documents classified as Review for Archival or Recommend Archival are routed to the designated content owner and records authority before remediation funds are committed. Accessibility personnel may support the assessment, but final decisions to retain, withdraw, transfer, archive, or destroy records must follow the applicable records schedule and the organization's established approval authority. Federal records may not be disposed of without approved disposition authority; state and local requirements should be confirmed under the relevant jurisdictional schedules. [6, 7]

4. Remediation, quality assurance, and delivery

Documents authorized for continued use proceed through the appropriate AI-only, human, or hybrid remediation workflow. e-508 manages pricing approval, production status, exception notifications, automated and manual quality assurance, validation reporting, and delivery or republication. The platform preserves the relationship among the original document, archival decision, remediation authorization, accessible deliverable, validation report, and final publication or disposition action.

PRACTICAL ARCHIVAL APPROACH

Before authorizing remediation, evaluate each document using six questions:

1. Is the document still used for a current service, program, transaction, or public-information need?	2. Is it the current and authoritative version?
3. Is a newer, accessible replacement already available?	4. Is the document retained primarily for reference, research, historical, or recordkeeping purposes?
5. Is it duplicated elsewhere or superseded by other content?	6. Does the applicable records schedule permit withdrawal, archival transfer, or destruction?

Documents that remain active and authoritative should proceed to remediation. Obsolete documents, duplicated, superseded, or maintained primarily for archival purposes should be referred to the content owner and authorized records official. Accessibility staff may recommend an action, but withdrawal, transfer, or destruction must follow the applicable records schedule and any legal hold or preservation requirements.

For state and local government web content, an inaccessible document should be treated as “archived web content” only when it satisfies all conditions of the DOJ exception; merely labeling or relocating it as archived is not sufficient. [3, 4]

EXPECTED VALUE AND PERFORMANCE MEASURES

Aligning accessibility remediation with records-management review enables agencies to focus resources on documents that remain active, authoritative, and valuable to the public. This approach reduces unnecessary remediation, improves backlog prioritization, strengthens disposition governance, and creates a defensible record of why each document was remediated, replaced, withdrawn, archived, or destroyed.

Recommended executive performance measures include:

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| 1. Inventory triaged within 10 business days |
| 2. Archival-review decisions completed within 15 business days |
| 3. Percentage of documents removed from the remediation queue through replacement, withdrawal, or authorized archival action |
| 4. Remediation costs avoided through effective triage |
| 5. Percentage of authorized remediation jobs delivered on time |
| 6. First-pass quality-assurance acceptance rate |
| 7. Percentage of active public documents meeting applicable accessibility requirements |
| 8. Percentage of decisions supported by complete approval, retention, remediation, and disposition records |

Together, these measures allow leadership to track not only remediation volume, but also whether the organization is reducing risk, controlling cost, improving accessibility, and managing its document inventory responsibly.

References

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- [2] U.S. Access Board. “Revised 508 Standards and 255 Guidelines (36 CFR part 1194).”
<https://www.access-board.gov/ict/>
- [3] U.S. Department of Justice. “Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities,” 89 Fed. Reg. 31320 (Apr. 24, 2024), 28 CFR part 35.
<https://www.federalregister.gov/documents/2024/04/24/2024-07758/nondiscrimination-on-the-basis-of-disability-accessibility-of-web-information-and-services-of-state#p-260>
- [4] U.S. Department of Justice. “Fact Sheet: New Rule on the Accessibility of Web Content and Mobile Apps Provided by State and Local Governments.”
<https://www.ada.gov/resources/2024-03-08-web-rule/>
- [5] Revelo Software. “e-508 Platform Modernization: Pricing and Workflow Specifications.” Internal product documentation, 2026.
- [6] National Archives and Records Administration. “Records Scheduling and Appraisal.”
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