

Project Management Community

Section 508 Compliance, Conformance, and Accessibility

Tuesday, June 11, 2019

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Thoughts on the subject

- “The power of the Web is in its universality. Access by everyone regardless of disability is an essential aspect.” Tim Berners-Lee, W3C Director
- “What we have are a few people who know a lot about Accessibility. What we need are a lot of people to know a little about it” Matt May, Adobe
- What If The First Question We Asked Was, “What Is So Unique About This Situation That It Justifies Exclusion? Instead Of, “How Much Does It Cost To Make It Accessible? Scott Rains, Accessibility is not Inclusion.

Today's Presentation

Gary Morin will provide a high-level overview of the need for Project Managers to integrate Section 508 compliance into its Information and Communication Technology (ICT).

He will facilitate a discussion of how project managers can provide employees with disabilities and members of the public with disabilities access to information that is comparable to the access available to others.

He'll provide examples highlighting just how broad and inclusive Information and Communication Technology is and how they most likely need to be conformant with accessibility standards.

Agenda

- Section 508 of the Rehabilitation Act
- Information and Communication Technology
- Determining Accessibility Requirements
- Section 508 Community at NIH
- Question and Answer Discussion
- Section 508 Contact Information
- Section 508 Training available at the NIH
- Section 508 Training Resources
- Measurement and Documentation Resources

Section 508 Benefits...

- People with Visual Disabilities (blind, low vision, color blindness)
- People with Hearing Disabilities (deaf, hard-of-hearing)
- People with Mobility Impairments or Dexterity Impairments (amputee, individual with prosthetic hand, carpal tunnel syndrome, RMI, etc.)
- People with Cognitive Disabilities – new to the Revised Section 508 Standards, in effect as of January 18, 2018
 - Long or Short-Term Memory?
 - Reading or Print Disabilities?

RATES OF FUNCTIONAL DISABILITY IN THE UNITED STATES

- 26% (one in 4) of adults in the United States have some type of disability.
- 13.7% of people with a disability have a mobility disability with serious difficulty walking or climbing stairs.
- 10.8% of people with a disability have a cognition disability with serious difficulty concentrating, remembering or making decisions.
- 6.8% of people with a disability have an independent living disability with difficulty doing errands alone.
- 5.9% of people with a disability are deaf or have serious difficulty hearing
- 4.6% of people with a disability have a vision disability with blindness or serious difficulty seeing even when wearing glasses.
- 3.6% of people with a disability have a self-care disability with difficulty dressing or bathing.

What is Information and Communication Technology (ICT)?

- ICT stands for “Information and Communication Technologies”. ICT refers to technologies that provide access to information through telecommunications. It is similar to Information Technology (IT), but focuses primarily on communication technologies. This includes the Internet, wireless networks, cell phones, and other communication mediums.
- Very Inclusive
- Not 100% Inclusive

Information and Communication Technology (ICT)

- Electronic Content: Websites, Online Training, Multimedia, PDF Documents, Forms
- Software: Desktop Applications, Mobile applications, Operating Systems, Authoring Tools (MS Office/Pages)
- Hardware: Computers, Servers, Tablets, Printers, Kiosks, Mobile Phones
- Support Documentation & Services: Training Services, Help Desk, Technical Support, Product Documentation

Accessible ICT is the Focus of Section 508

Reasonable Accommodation is the focus of Sec. 504

- Without regard for the employees or members of the public themselves, with or without disabilities, Section 508's focus is to provide or construct an accessible ICT environment.
- Section 508 of the Rehabilitation Act of 1973 as amended is a set of standards that requires Federal agencies to make ICT accessible to employees and members of the public who have disabilities in a comparable manner to the access experienced by employees and members of the public without disabilities.
- The Section 508 Standards apply to ICT that is "procured, developed, maintained, or used" by agencies of the Federal government. Section 508 was enacted to eliminate barriers to ICT, make opportunities available.
- Persons with Disabilities are the focus when it comes to providing reasonable accommodations 'upon request', under Section 504. this is where Assistive Technology (AT) comes into play.

Terminology

- Compliance vs. Conformance
- We, as civil servants and as a federal agency, comply with a law. ICT products and services conform to/with standards.
- Section 508 – is a part of which law?
- The Rehabilitation Act of 1973, as amended, or the Americans with Disabilities Act (ADA) of 1990?

Section 508 of the Rehabilitation Act

- Sets the Standards for the Information and Communication Technology (ICT) that we develop, procure, maintain and use to ensure comparable access to employees and members of the public with disabilities
- Procurement is key (effective June 25, 2001), Revised Sec. 508 Standards in effect as of January 18, 2018
- Federal Acquisition Regulation (FAR) Council charged with updating the FAR; Department updating the Health and Human Services Acquisitions Regulation (HHSAR)
- Federal government serves as a model for accessibility and must ensure applicable Standards are incorporated into requirements documents when procuring ICT

15 Things Project Managers Should Know About Accessibility

1. You're critical to the process
2. Know what accessibility is and why it matters
3. Accessibility is a requirement
4. There are established standards
5. Know your organization's accessibility policy
6. Plan for accessibility from the beginning
7. Make sure all content, design, and development teams are thinking about accessibility
8. Prepare for questions and objections
9. Build in time for testing, remediation, and re-testing
10. Ensure you have the right accessibility expertise
11. Assign clear roles in the process
12. Have a plan for accessibility challenges
13. Have a plan for any future enhancements
14. Accessibility needs to be maintained
15. Track and learn for future projects

Section 508 as a Critical Partner (1)

- Phase 1 Initiation
 - N/A
- Phase 2 Concept
 - Make sure that plans are in place to incorporate Section 508 requirements in the contract(s).
- Phase 3 Planning
 - Verify that Applicable Section 508 standards are identified and planned for and that the vulnerability and impact of being non compliant with Section 508 has been included in the overall risk management planning.
- Phase 4 Requirements
 - Make certain that the requirements for applicable Section 508 standards have been identified
- Phase 5 Design
 - Establish that any new or further requirements that have been discovered that are necessary to accommodate individuals with disabilities have been added to the Requirements Document and the Design documents. Confirm that there are test cases which incorporate Section 508 standards.

Section 508 as a Critical Partner (2)

- Phase 6: Development
 - Establish that requirements identified for Section 508 compliance are incorporated into the system.
- Phase 7: Test
 - Verify that test plan results for Section 508 testing are satisfactory.
- Phase 8: Implementation
 - Establish is implementation has maintained the integrity of Section 508 compliance.
- Phase 9: Operations and Maintenance (O&M)
 - Ascertain that ongoing change requests incorporate requirements for Section 508.
- Phase 10: Disposition
 - <N/A>

The NIH Section 508 Community

- [NIH IC Section 508 Coordinators](#)
- [NIH Section 508 Advisory Group](#)
 - The AG meetings are open to all of NIH, if you are interested in attending or becoming a member, please email for more information.
 - First and foremost, know who your IC's Section 508 Coordinator is – they're your first point-of-contact for any Section 508 and ICT Accessibility concern.

Requirements Resources

- GSA [Accessibility Requirements Tool \(ART\)](#) - includes a USER MANUAL (replaces previous BuyAccessible Wizard)
- Revised 508 Standards Applicability Checklist <https://www.section508.gov/buy>
- Information Technology Industry Council (ITIC). [Voluntary Product Accessibility Template \(VPAT\) Update](#)
 - [VPAT 2.3 Rev 508 \(April 2019\)](#) (April 19, 2019) (replaces [VPAT 2.3 Section 508](#) (December 19, 2018))
 - [VPAT® 2.0 – Frequently Asked Questions](#) (October 04, 2017)
 - [Reporting Conformance to ICT Accessibility Standards](#) (October 04, 2017)
- HHS Annual Reports – [for contracts executed before January 1, 2018](#)
- HHS Annual Reports – [for contracts executed since January 1, 2018](#)

Department of Health and Human Services HHS Policy on Section 508 and Accessibility of Technology

- Department of Health and Human Services HHS Policy on Section 508 and Accessibility of Technology
 - <https://www.hhs.gov/web/governance/digital-strategy/it-policy-archive/department-of-health-and-human-services-hhs-policy-on-section-508-and-accessibility-of-technology.html>
 - <https://intranet.hhs.gov/policy/508-accessibility>

Determining Accessibility Requirements in Development or in Acquisition

- Option 1 – Manually
 - Follow step-by-step guidance on how to [Determine 508 Standards and Exceptions](#) and complete the [Standards Applicability Checklist](#)
 - [508 Standards and Exceptions Chart & Examples](#)
- Option 2 – Automated
 - Use the [Accessibility Requirements Tool \(ART\)](#), which automates the [Standards Applicability Checklist](#) and generates customized solicitation language
 - [Find Sample Procurement Language \(formerly Quick Links\)](#)
- [Revised 508 Standards Applicability Checklist](#)
- [Accessibility Requirements Tool \(ART\), User Manual](#)
- [VPATs! – the Voluntary Product Accessibility Template®](#)

Testing is Critical

Why am I Testing?

- Am I/Is the Agency complying with the law?
- Does the ICT product or service conform to/with the standards?
- Is it accessible to persons with disabilities?
Is it usable to persons with disabilities?

How am I Testing?

- Manual Testing, against the Standards, using a Voluntary Product Accessibility Template (VPAT) to create an Accessibility Conformance Report (ACR)?
- Automated Testing?
- Testing with a diversity of Assistive Technology for compatibility?

Guidance on Testing

- Based on the US Access Board's Standards
- Automated tools for web sites (including, but not limited to, Deque WorldSpace Comply, ...)
- Assistive Technology – tests for Accessibility, Usability and Compatibility. Not for “508 conformance,” but important nonetheless.

Tools for Testing – Assistive Technology

- Testing with Assistive Technology is not a means of ensuring Section 508-conformance – that is done through manual checking with the US Access Board Standards for Section 508 and through Automatic tool testing.
- Use Assistive Technology to test for
 - Accessibility
 - Usability
 - Compatibility

NIH Accessibility Testing Lab

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- A No-Cost Resource for all NIH Staff persons
 - Building 12A, Room B47
 - Fernwood 3NE-26A/B
 - [Software applications available in the NIH Accessibility Testing Lab \(NAT Lab\)](#)
 - The NIH Accessibility Testing Labs (NAT Labs) are provided as a free service to the NIH. The labs support and facilitate testing and remediation of applications, websites, electronic documents, and other electronic content to ensure accessibility and compliance with Section 508 standards. This service is a collaboration between the NIH Office of the Chief Information Officer (OCIO) and the Center for Information Technology (CIT).

Reading List

- Interactive Accessibility. Download the Assistive Technology Testing Checklists. Have you been told that you need to comply with Section 508 or WCAG 2.0? <https://www.interactiveaccessibility.com/download-assistive-technology-testing-checklists>
- List of web accessibility evaluation tools from the Web Accessibility Initiative (WAI) - <http://www.w3.org/WAI/RC/tools/complete>
- Texas Dept of Information Resources' EIR Accessibility Tools, Training, and Related Resources <https://dir.texas.gov/View-Resources/Pages/Content.aspx?id=39>
- U.S. Department of Commerce http://www.osec.doc.gov/webresources/bestpractices/bp3_accessibility_testing.htm
- U.S Department of Veterans Affairs
 - Section 508 <https://mobile.va.gov/content/section-508#>
 - Is My App Section 508 Compliant? <https://mobile.va.gov/content/my-app-section-508-compliant>
- What Project Managers Need to Know About Accessibility. BOIA, June 1, 2019. <https://www.boia.org/blog/what-project-managers-need-to-know-about-accessibility>
- When is the right time to plan for digital accessibility? BOIA, November 7, 2018. <https://www.boia.org/blog/when-is-the-right-time-to-plan-for-digital-accessibility>

Section 508 Training available at the NIH

- NIH CIT courses
 - Accessible Microsoft Word, PowerPoint, and Excel documents, as well as how to convert them to accessible PDF files
- OCIO Courses
 - How to Make Multimedia Accessible
 - How to Make Images Meaningfully Accessible
 - General Q&A Sessions bimonthly
 - Join us this June 27, 2019, from 1-3pm at Building 12A, Room B51

GSA Section 508 Training Resources

- [GSA Section 508](#)
 - [Section 508: What It Is and Why It's Important?](#) (FAI available)
 - [Section 508 Awareness](#)
 - Role-based training:
 - [Micro-Purchases and Section 508 Requirements](#) (FAI available)
 - [Procuring Section 508 Conformant ICT Products and Services](#) (FAI available)
 - [Technology Accessibility Playbook: How to Build an Effective Section 508 Program](#)
 - [Accessibility of ICT: An Overview for Government Executives](#)

Thank you for attending!

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- [NIH Section 508 Team](mailto:NIHSection508Help@od.nih.gov)
(NIHSection508Help@od.nih.gov)
 - NIH Office of the Chief Information Officer
 - 6555 Rock Spring Drive, Suite 300
 - Bethesda, MD 20817
 - (301) 496-1168 Voice; (240) 200-5030 Videophone; (301) 451-9326 TTY/NTS
 - Section 508 Guidance:
 - NIH <https://ocio.nih.gov/ITGovPolicy/NIH508/Pages/default.aspx>
 - NIH IC Sect 508 coordinators: <https://ocio.nih.gov/ITGovPolicy/NIH508/Pages/Section508Coordinators.aspx>
 - NIH Section 508 ListServ: <https://ocio.nih.gov/ITGovPolicy/NIH508/Pages/NIHSection508ListServ.aspx>
 - HHS <https://www.hhs.gov/web/section-508/index.html>
 - GSA <https://section508.gov>
 - US Access Board <https://www.access-board.gov/>

Questions?

We've got
Answers!



Office of the Chief Information Officer (OCIO)

Enabling Discovery Through Technology