

Welcome to the Section 508 Best Practices Webinar Series

A collaborative program between the
Accessibility Committee of the CIO Council, The U.S. Access Board and eFedLink/ODEP

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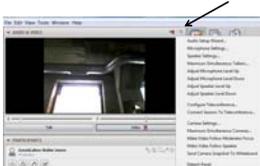
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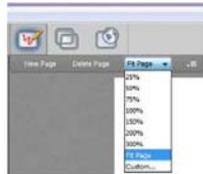
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508 Reporting Template and Baseline Assessment Plan

Moderator: Timothy Creagan, Senior Accessibility Specialist
U.S. Access Board

Katie Pittman, Special Assistant, Dept of Veterans Affairs
CIOC Accessibility Committee Operations Manager

Deborah Kaplan, Senior Advisor
Social Security Administration

July 30, 2013

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Agenda

- ▶ Webinar Logistics
- ▶ Co-Sponsors
- ▶ Welcome
- ▶ Overview of webinar series
- ▶ Introduction of Presenters
- ▶ Presentation: "508 Reporting Template and Baseline Assessment Plan"
 - Background
 - Plan Requirements
 - Template Explanation
- ▶ Q & A

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This webinar is sponsored by:



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Welcome

- ▶ Webinar series: "Best Practices in Federal Section 508 Implementation"
 - This webinar is part of a series. Other presentations can be viewed at:
 - <https://efedlink.org/allqual/resource-shared-webinars.cfm> and <http://www.adaconferences.org/CIOC/Archives/>
- ▶ A best practice is a policy, process, procedure or technique proven effective over time and repeatable by multiple agencies.
- ▶ A best practice is generalized so that diverse agencies may use it in their own organizations but specific enough to provide useful guidance and instruction.
- ▶ The CIO Council's Accessibility Committee has published a library of 508 Best Practices at www.Section508.gov

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Section 508 Best Practices Webinar upcoming DATES for 2013:

- ▶ September 24, 2013 - WCAG 2.0
 - ▶ November 21, 2013 - Topic pending
- Time: 1:00 to 2:30 p.m. ET

Past webinars: ARCHIVED:

- <http://www.adaconferences.org/CIOC/Archives>
- <https://efedlink.org/allqual/collaborate-webex-archive.cfm>

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Section 508 Best Practices Webinar series 2013

- ▶ More information, ask the Education Subcommittee co-chairs:
 - Tim Creagan – creagan@access-board.gov
 - Deborah Kaplan – deborah.kaplan@SSA.gov

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Presenters

Panelists:

- ▶ Katie Pittman, Special Assistant Dept. of Veterans Affairs
CIO Accessibility Committee Operations Manager
- ▶ Deborah Kaplan, Senior Advisor
Social Security Administration

Moderator:

- ▶ Timothy Creagan, Senior Accessibility Specialist, U.S. Access Board

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508 Strategic Plan and Reporting – Background

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What is Section 508?

- Section 508 is part of the Rehabilitation Act as amended in 1998
- It requires accessibility in the development, procurement, maintenance, or use of electronic and information technology (EIT) for employees with disabilities and for members of the public with disabilities
- To date agencies have developed their own Section 508 implementation plans and programs

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What is Changing and What Does It Mean?

- ▶ OMB released a new 508 Strategic Plan on 24 Jan 2013:
 - “Improving Management of Section 508 of the Rehabilitation Act”
 - Organized into 3 Initiatives: Transparency, Accountability, Collaboration
 - Focuses on the creation of successful 508 Programs at the agency-level
- The Plan outlines several new requirements based on the 3 included Initiatives

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How Does This Fit Into the Big Picture?

- ▶ The 508 Strategic Plan is strongly aligned with the Obama Administration’s broad goals of increasing transparency and improving access to government information and data
 - 2009 White House memo on Transparency and Open Government
 - IT Dashboard is an example
 - Digital Government Strategy issued in May 2012
 - designing for openness from the start

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What Do You Have to Do?

Responsible Party	Requirement	Due Date
Accessibility Committee	Create a government-wide 508 Reporting Template	03/01/13
Agency CIO	Assign a Section 508 Coordinator and notify GSA	03/23/13
GSA	Update reference manual for 508 coordinators	06/2013
GSA	Share recommendations and plans for improving the Buy Accessible Wizard	06/2013
GSA	Transform Section508.gov website into a one-stop for 508	07/24/13
Agency	Post an accessibility statement on all federal agency inter- and intranet websites (sample statement at section508.gov)	7/24/13

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What Do You Have to Do?

Responsible Party	Requirement	Due Date
Agency CIO and CAO	Develop a plan for a base line assessment of current 508 efforts and provide to the Accessibility Committee	120 days after template issuance
Agency CIO and CAO	Complete the planned assessment using the standard reporting template and provide to the Accessibility Committee	12/30/13 + 6 month increments
GSA	Refresh Section 508 learning modules for the acquisition workforce	1Q of FY2013
Agency CIO and CAO	Share progress on improving baseline assessment measures with OMB	3Q of FY2014

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Do I Have to Do This Alone?

- ▶ Agency Chief Acquisition Officer (CAO)
 - Responsible for agency performance of acquisition activities and acquisition programs, to include development of the agency's acquisition workforce.
 - In collaboration with the Chief Information Officer (CIO), ensure Section 508 requirements are incorporated into any EIT that is procured by the agency.
- ▶ Agency Chief Information Officer (CIO)
 - Establish the agency Section 508 program, provide leadership of the program, and appoint the agency Section 508 coordinator/manager.
 - Ensure Section 508 accessibility considerations are incorporated into the planning, operation, and management of any EIT that is developed, used, or maintained by the agency.
 - In collaboration with agency CAO, ensure Section 508 is considered in EIT procured by the agency.

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Do I Have to Do This Alone?

- ▶ **Agency Section 508 Coordinator**
 - Manage an agency Section 508 program on behalf of the agency CIO, to include developing and maintaining agency policies, guidebooks, and disseminating best practices.
 - Provide consultation to, or participate in, agency capital planning and/or business case development and IT governance to ensure EIT appropriately considers Section 508 across the IT and acquisition lifecycles.
 - Partner with other Section 508 Coordinators throughout the Federal Government to assist in meeting Section 508 goals and objectives.
 - Consider additional detailed responsibilities as provided for in the GSA Resource Manual for Section 508 coordinators which will be located and maintained on www.section508.gov.
- ▶ **Information Technology Program and Project Managers**
 - Consistent with the Federal Acquisition Certification for Program and Project Managers, and the OPM Competency Model for IT Program Management,¹⁰ ensure Section 508 is considered throughout the acquisition and information technology lifecycles.

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Do I Have to Do This Alone?

- ▶ **Contracting Officer**
 - Review and comply with the of FAR 11.002(f) and 39.2 by ensuring Section 508 standards are considered in acquisition planning documents and procurement requirements for EIT and that deliverables meet accessibility standards.
 - Include appropriate Section 508 accessibility standards in requirements and acquisition planning documents and agreements.
- ▶ **Contracting Officer's Representative and Requiring Officials**
 - Include appropriate Section 508 accessibility standards in acquisition planning and requirement documents.
 - Verify that products or services delivered under an agreement meet the accessibility terms and conditions included in a contract prior to accepting deliverables.

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Agency Baseline Assessment Plan

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Base-Line Assessment Plan

- ▶ Due date: Nov. 12, 2013
- ▶ Roles and Responsibilities:
 - Agency CIO, in consultation with Agency CAO, will develop the plan
 - Agency CIO will send it to the Accessibility Committee
- ▶ The plan will address whether the agency will conduct a full assessment of relevant functions to fill out the template or take samples from high risk or key areas, as identified by the agency

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Baseline Assessment Plan

- ▶ Items to Consider
 - What is the scope of your planned assessment?
 - What data will you collect and from whom?
 - What will be required to get it done?
 - What are some internal milestones to make sure you meet the deadline?
 - Who needs to be involved?
 - What communications are needed?
 - Who will consolidate the data?
- ▶ The Accessibility Committee will gladly accept early submissions

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508 Reporting Template

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What Has Been Issued

- ▶ 508 Reporting Template
 - Developed by the CIOC Accessibility Committee in collaboration with OMB
 - Sent for agency comment
 - Edited based on comment adjudication
 - Tasked by US CIO and US CAO to Agency CIOs and CAOs
 - Posted on Section508.gov for reference
- ▶ Template Instructions Sheet
 - Created in response to Agency comment adjudication
 - Posted on Section508.gov for reference

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Reporting Template

- ▶ 2 page template
 - Based on 508 programmatic focus areas using program maturity metrics
 - Next to each category is a more detailed description of that category
 - 4 assessment dates: 12/31/13, 6/30/14, 12/31/14 and 6/30/15
 - 508 standards validation is required for specific EIT by measuring % or number in compliance

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Template Instructions Sheet

- ▶ Instructions for the template (Word)
 - Background
 - Detailed description of maturity measures
 - Helpful examples
 - Detailed description of 508 validation metrics

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Template Measures and Metrics

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Maturity Measures

- ▶ Ad Hoc: No formal policies, process or procedures defined
- ▶ Planned: Policies, processes and procedures defined and communicated.
- ▶ Resourced: Resources committed and/or staff trained to implement policies, processes and procedures.
- ▶ Measured: Validation is performed; results are measured and tracked
- ▶ These are progressive and cumulative.

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Metrics: Acquisition

- ▶ What is measured? The extent to which an agency validates procurement solicitations for 508 contract language in Statements of Work and Performance Work Statements.
- ▶ Importance: Effective 508 language in these critical documents ensures that vendors know which 508 standards apply to a purchase and what requirements they must be able to demonstrate conformance.

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Metrics: Acquisition

- ▶ Examples of maturity measures:
 - Ad Hoc – The agency approach is inconsistent, and no formal policies and processes are in place to determine the extent to which procurement documents include 508 language.
 - Planned – Policies and procedures state methods to be used to track 508 language in procurements. No effective implementation has yet taken place. Staff have not been assigned to carry out this monitoring function, nor have any been trained.

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Metrics: Acquisition

- ▶ Examples of maturity measures
 - Resourced – Staff are available and have been trained to carry out 508 language monitoring of procurement Statements of Work and Performance Work Statements. Policy is routinely implemented.
 - Measured – In addition to all of the above, the agency regularly tracks adherence to 508 in procurement documents, collects the data and uses the results to improve the 508 acquisitions process.

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Metrics: EIT Lifecycle Activities

- ▶ What is measured? Whether agencies incorporate 508 requirements into agency EIT lifecycle activities, such as enterprise architecture design, development, testing, deployment and maintenance.
- ▶ Importance: Unless included in the entire lifecycle, 508 implementation is needlessly costly, ineffective and sometimes not possible.

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Metrics: EIT Lifecycle Activities

- ▶ Examples of maturity measures:
 - Ad Hoc – No formal policies or procedures define how to incorporate 508 into the EIT lifecycle activities. These activities often take place without consideration of 508 or it is considered only at the last minute when it's too late or expensive to achieve.
 - Planned – Policies and procedures do exist explaining how to include 508 in these activities. Milestones for 508 consideration are defined.

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Metrics: EIT Lifecycle Activities

- ▶ Examples of maturity measures:
 - Resourced – Policies and procedures are followed by staff who have been given this explicit assignment, and training in appropriate methods is available. 508 is regularly incorporated into EIT lifecycle activities.
 - Measured – The agency collects data to verify that 508 is included appropriately in EIT lifecycle activities. This data is analyzed regularly to improve overall 508 inclusion practices.

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Metrics: Testing and Validation

- ▶ What is measured? Does the agency test and validate Section 508 claims of conformance?
- ▶ Importance: Testing of 508 conformance is the only way to know whether vendor claims regarding 508 are accurate. For internal EIT lifecycle activities, regular testing of actual 508 conformance is the best way to understand what is being handled correctly and where there is room for improvement. The results of validation testing can also be used for development of work-arounds and for remediation planning.

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Metrics: Testing and Validation

- ▶ Examples of maturity measures:
 - Ad Hoc – No formal policies or processes exist regarding 508 testing. Vendor claims of 508 conformance are accepted without independent validation. If any testing is performed, there are no protocols to follow, no guidelines regarding methodology or tools or how to report results.
 - Planned – Policies and processes define what should be testing, what methodologies used, reporting format and schedules to be followed.

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Metrics: Testing and Validation

- ▶ Examples of maturity measures:
 - Resourced – Agency staff have the specific assignment of 508 validation testing and have been trained in appropriate methods and frameworks. Testing activities are supported. Testing takes place regularly and predictably.
 - Measured – Testing activities are recorded, and results are collected and analyzed. The results are used to inform decision making, processes and planning.

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Metrics: Complaints Process

- ▶ What is measured? Whether your agency has an effective 508 complaint process.
- ▶ Importance: A key way for an agency to evaluate the effectiveness of its 508 program is to make positive use of the 508 complaint process. In addition to finding out about specific 508-related problems, the agency can identify trends to understand more pervasive challenges. A working complaint process can prevent escalating legal challenges.

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Metrics: Complaints Process

- ▶ Examples of maturity measures:
 - Ad Hoc – There is no formal agency complaint process for 508 problems. If at all, complaints are handled informally and inconsistently.
 - Planned – There is a formal complaint process and a plan for letting employees and members of the public know about it. No resources have yet been allocated to getting these things done.

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Metrics: Complaints Process

- ▶ Examples of maturity measures:
 - Resourced – The complaint process has been communicated as planned. 508 program staff and others such as legal counsel have been trained and review and dispose of complaints according to established policy and timeframes.
 - Measured – All complaints are collected and tracked. Any variations in actual practice from established policies are remedied. The results are used to inform and improve the 508 program.

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Metric: Training

- ▶ What is measured: the extent to which the agency trains relevant staff in 508 policy, practices and compliance.
- ▶ Importance: Effective 508 implementation requires knowledge, skills and experience in many different areas. Many different employees in a variety of agency components need some form of 508 training. Specialized training is required, and most employees do not receive it as part of their professional training and education.

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Metric: Training

- ▶ Examples of maturity measures:
 - Ad Hoc - The agency has no formal 508 training program. Any training that employees obtain is not centrally planned or made available.
 - Planned - The agency conducts 508 training needs assessments, has identified appropriate training resources and can make them available, and there is a plan to conduct regular ongoing 508 training to all relevant stakeholders.

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Metric: Training

- ▶ Examples of maturity measures:
 - Resourced - A program is in place to meet the 508 training needs of all relevant stakeholders. 508 training is integrated into agency professional development resources. Fiscal support is available for training activities.
 - Measured - Data is collected about training activities and used to assess the effectiveness of 508 training plans. Training participants evaluate the content of training sessions, and that data is collected and used to improve the quality of the training.

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Additional Resources

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Accessibility Committee Resources: 508 Strategic Plan

- ▶ The Accessibility Committee:
 - Drafted the reporting template and will use the Agency 508 reporting to tailor future support activities
 - Has several resources available to assist agencies with the mandates of the 508 Strategic Plan that will be targeted based on Reporting Data
 - Published Best Practices Library (section508.gov)
 - Bi-Monthly Targeted Webinars
 - Forum for Agency input and involvement through Committee and Subcommittees
 - Vendor Outreach Initiatives
 - Is supporting interagency efforts to address testing inconsistencies and challenges through a Unified Tester Program with supportive tools and guidance

Why Accurate Reporting Will Help!

- ▶ The CIOC Accessibility Committee has been charged with using the information in the assessments for interagency analysis, trending, and planning to improve collaboration across agencies, reduce redundancies, and develop solutions and recommendations for improving Section 508 management across the Federal government.

For More Information

- ▶ For Questions on the Template or Plan:
 - feedback@cio.gov
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- ▶ Katie Pittman, Special Assistant
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