

Welcome to the Section 508 Best Practices Webinar Series

A collaborative program between the
Accessibility Community of Practice of the CIO Council and The U.S. Access Board

The Session is Scheduled to begin at 1:00pm Eastern Time
We will be testing sound quality periodically

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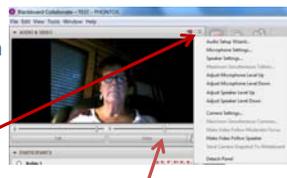
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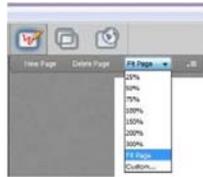
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Section 508 Best Practices Webinar Series

- ▶ This webinar is part of a series: "Best Practices in Federal Section 508 Implementation"
 - Other webinars from this series are archived at:
 - <http://www.adaconferences.org/CIOC/Archives/> and
 - <https://efedlink.org/allqual/resource-shared-webinars.cfm>
- ▶ 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 Community of Practice has published a library of 508 Best Practices at www.Section508.gov

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Section 508 Best Practices Webinar upcoming DATES for 2016:

- ▶ Webinars dates will be bi-monthly during 2016.
January, March, May, July, September, November
- ▶ Next Webinar: March 29, 2016 – Topic: TBD
Time: 1:00 to 2:30 p.m. ET
- ▶ Future webinar dates and topics are forthcoming

Past webinars are ARCHIVED:

- <http://www.adaconferences.org/CIOC/Archives>
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Section 508 Best Practices Webinar Series 2013 –2016

- ▶ For more information, contact the Education Subcommittee co-chairs:
 - Tim Creagan – creagan@access-board.gov
 - Deborah Kaplan – deborah.kaplan@hhs.gov

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“Managing partial compliance with Section 508”

Moderator:

Deborah Kaplan, Section 508 Policy Lead, Office of the CIO, HHS

Presenters:

Timothy Creagan, Senior Accessibility Specialist, U.S. Access Board
Yolonda Humphrey, Program Manager – IRS Section 508 Coordinator
Don Barrett, Dept. of Education Section 508 Coordinator
Jennifer Horan, Consumer Financial Protection Bureau, Section 508 Program Manager

February 3, 2016

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Learning Objectives

- ▶ What is “partial compliance” with Section 508?
- ▶ What does Section 508 say about “partial compliance”?
- ▶ What is the relationship between Sections 501, 504 and 508 when not all of the relevant standards are met?
- ▶ How can an agency be pro-active to avoid a partially compliant outcome?
- ▶ What can be done to achieve “effective access”?
- ▶ Q& A -

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Presenters

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Jennifer Horan, Consumer Financial Protection Bureau, Section 508 Program Manager

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U.S. Access Board

Timothy Creagan
Senior Accessibility Specialist

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Section 508: 1194.1 Purpose

- ▶ Each Federal department and agency, as well as the U.S. Postal Service, when procuring, maintaining, developing or using electronic and information technology, must ensure that:
- ▶ Federal employees with disabilities, and members of the public with disabilities seeking information or services, have access to and use of information and data that is comparable to the access and use by persons who are not individuals with disabilities,
- ▶ Unless an "Undue Burden" would be imposed on the agency.

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1194.2 Application – What does 508 require?

- ▶ (a) Products must comply with all applicable provisions...unless...an undue burden would be imposed on the agency. [Exception]
- ▶ (1) ...provide individuals with disabilities an alternative means of access that allows the individual to use the information and data.
- ▶ (2) Document undue burden
- ▶ (b) ..Commercial availability or in response to Government solicitation. Agency must...procure the product that best meets the standards.

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What is "partial compliance" with Section 508?

- ▶ When a product meets some, but not all of the applicable Section 508 requirements, it is deemed "partially complying".
- ▶ Example: A learning management system with a video player that only has one audio channel. The video player cannot play the audio description track on a video. Therefore the visual information in the video cannot be provided using audio description.
- ▶ Problem: How can the visual information in the video be provided?
- ▶ Possible solution or "work around":
A "work around" needs to address the non-compliant technology.

For example, a speaker might describe what is onscreen during a live presentation of the video.

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IRS
Yolonda Humphrey
Section 508 Program Manager

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Information Resources Accessibility Program (IRAP)

- ▶ IRAP Program Profile
 - Currently supports 3,000+ agency employees with disabilities that use assistive technology (AT) on a daily basis.
 - IRS provides an operational budget of approximately \$3Mil annually to deliver services, products, training to the Agency.
- ▶ IRAP Service Delivery Model – Program is structured as a branch with two Front line managers. 508 Customer Support office is focused on delivery of products and services to IRS employees who require Assistive Technology. 508 Program Support is focused on technical and procurement guidance/support.
 - The Customer Support office has established operational partnerships with the Reasonable Accommodation office and the Desk side Support organization to facilitate incoming requests for employees that require AT.
 - Performs assessments with employees and manager to determine the right “prescriptive” solution of AT; orders equipment/software, etc., which is then installed by the Desk-side technicians.
 - Products delivered to IRS employees are selected from a catalogue. All products contained in the catalogue have been tested and approved for use within the IRS enterprise environment.
 - Benefits to this approach are that we are able to better manage Enterprise upgrades to new platforms, environmental changes, software upgrades, etc. We are able to better troubleshoot issues that occur and as needed establish exception groups in the event that technical workarounds are not available immediately. Over the past 3 years we have become firmly established integration partners as well as early adopters for new agency software solutions.

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IRAP as an Enterprise Life Cycle (ELC) Stakeholder & Procurement Reviewer

- IRAP is an Enterprise Life Cycle (ELC) stakeholder and the 508 Program Support office provides technical guidance/support to projects that are responsible for testing solutions as a part of the Enterprise Life Cycle activities. Additionally, they provide acquisition guidance, procurement documentation review/recommendations and product evaluation support.
 - ELC stakeholder whose signature is required for milestone exits
 - Helps projects understand Section 508 policies and standards
 - Reviews project Section 508 documentation (the Accessibility Compliance and Mitigation Package)
 - Advises projects on testing techniques
 - Provides projects with subject matter expertise on Section 508
 - Determine if the purchase is for EIT products or services.
 - Determine the applicable Section 508 provisions.
 - Work extensively with project stakeholders to facilitate technical and procedural workarounds, develop risk response documentation and communication strategies.

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IRAP and Section 508

- IRAP
 - Supports major agency solicitation activities by establishing 508 requirements and key deliverables within the RFP phase. Also may either act as a technical panel consultant or participate on the panel as a reviewer during the award evaluation phase.
 - Participates in enterprise software/platform updates discussions/planning/testing and execution activities.
 - Supports agency level conversations with vendors in defining/clarifying deliverable expectations.
 - On a limited basis, will review technical deliverables and provide feedback as a part of the receipt and acceptance process.
 - Support product demonstrations.

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Department of Education

Don Barrett
Section 508 Coordinator

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“Work Arounds” under Section 508:

- ▶ “Work arounds” are solutions under Section 504 (accommodations) designed to provide temporary solutions to Section 508 problems (accessibility).
- ▶ Sections 504 and 508 can work together in a very complimentary way. The Section 504 accommodation is sometimes necessary for an individual with a disability to be able to fully access a Section 508 compliant system, as well as a partially compliant one.
- ▶ This synergy between the accommodation and the accessibility provides the best of both worlds, maximizing the likely success of any disabled person using information and communication technology.

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Real life case study of a “Work Around”:

- ▶ A Real life case study recently encountered on the Section 508 coordinator list: inaccessible multi-function printers (MFP).
- ▶ The problem: the menu function for some printers is not accessible. It is presented in text, with no alternative format such as audio or Braille.

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Real life case study of a “Work Around” (Part 2) :

- ▶ Various proposed solutions –
 - Vendor develops and sends out a patch to all the Multi-function printers (MFPs)
 - Access is provided to an accessible print driver to control the MFP
 - A Lexmark web-based accessibility portal solution is provided
 - Employee goes to the MFP with another person to help them
 - Grant a co-worker “proxy” access to print jobs
 - Provide a local device at the employee’s desk
- ▶ Limitations of these proposed workarounds
- ▶ Conclusion: The work-around always provides a narrower level of access than the optimal 504/508 synergistic solution

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Benefits of “Work Arouns”:

- ▶ Cost effective, timely and provide simple solutions
- ▶ Popular solution: Managers tend to jump at the prospect of work arounds
 - Drawback: Some users may not have complete access to all functions of ICT.
- ▶ Despite their potentially marginal approach, work arounds provide enough access to reduce immediate risk.

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Use Caution with “Work Arounds”:

- ▶ Some “work arounds”, such as in the case study above, appear to be total solutions, but are fraught with unforeseen consequences.
- ▶ Some can provide real assistance in a pinch, but must be seen as the means to an end, not the end itself.
- ▶ “Work arounds” can be life-savers, but must be used with care.

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Use Caution with “Work Arounds” part 2:

- ▶ Examples might include:
 - client OCR of inaccessible Documents,
 - provision of desktop printers as seen in the above case study,
 - scripting of assistive technology to work with non-compliant ICT,
 - server-based solutions that configure inaccessible web sites on the fly, and many others.
- ▶ Bottom Line: don't let a “work around” become a permanent solution.

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How to avoid the need for a “Work Around”:

- ▶ Key to minimizing need for “work arounds” is sound contractual language in the initial Request for Performance (RFP) and the contract:
- ▶ Identify and include the following:
 - ▶ Specific standards ICT in work statement references;
 - ▶ Language that covers vendor responsibilities and obligations;
 - ▶ Language that spells out testing and/or other validation requirements to ensure compliance;
 - ▶ Language that requires vendor to remediate should their solution prove non-compliant.
- ▶ Conclusion: The poorer the contract language, the more “work arounds” are needed at the end of the process.

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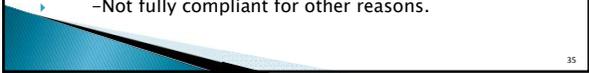
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Reasons for Partial Compliance:

- ▶ -Market non availability
- ▶ -Legacy system, planned for replacement
- ▶ -Browser/OS upgrades - what used to work now doesn't really work anymore due to a browser or OS upgrade.
- ▶ -Shared services - 508 was not fully considered, or support for configurations at the agency didn't include 508; 508 was not considered with training materials, etc.
- ▶ -Something was already procured and never checked for compliance with 508, now you are "stuck" with it.
- ▶ -Something was designed in-house and the tools used do not create 508 output; 508 was not considered.
- ▶ -Free tools were used that do not create 508 compliant output.
- ▶ -Not fully compliant for other reasons.



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Strategies for addressing partial compliance:

- ▶ Equivalent access plan should be developed.
- ▶ 504/501/508 overlap
- ▶ Version upgrades are opportunities for vendors or owners of the solution to include better 508 supports as upgrades occur.



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What is the optimal scenario for partial compliance?

- ▶ Bid language – crucial for ensuring that the product is accessible and usable and that the training is inclusive and 508 compliant.
- ▶ Example: SharePoint. [Problem: It is a Content management system that may not work with JAWS screen reader software.]
- ▶ JAWS 17 has support built by Freedom Scientific but that doesn't help any other AT users. This solution doesn't address the breadth of 508.
- ▶ SharePoint must be customized by each agency with 508 in mind. Users must be trained to only upload content that is 508 compliant.
- ▶ Statement of Work (SOW) must require support for 508 from the vendor.

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The Role of the Project Owner/Program Manager versus the 508 Manager:

- ▶ Responsibility – Even if it is not on the market or already in the network, the project owner or program manager is still responsible to make sure market research has been done and also ensure that an equivalent facilitation plan is put into place.
- ▶ Has there been any testing? Ultimately the project owner is responsible. They need to understand this and be responsive and support attempts to address a known 508 issue.
- ▶ If the 508 Manager has to test and figure out a plan to support an AT user who filed a complaint with the agency's 504 office, the project owner needs to support and ensure execution.

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RESOURCES

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Section 508 Standards:

- ▶ <https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards/section-508-standards>

Section 504 Frequently Asked Questions:

- ▶ http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_op/disabilities/sect504faq

IRS Reasonable Accommodation Resources:

- ▶ <https://jobs.irs.gov/pdf/RA2007appendixB.pdf>

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Questions



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