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Section 508 Best Practices Webinar Series

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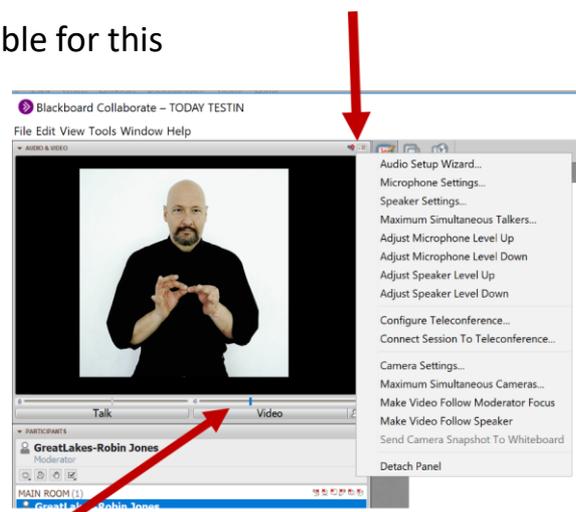
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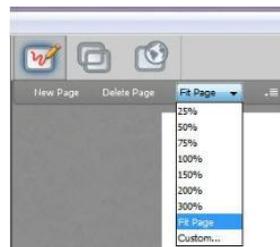
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Welcome

This webinar is part of a series showcasing “Best Practices in Federal Section 508 Implementation”. Other presentations can be viewed at:

- www.adaconferences.org/CIOC/archives and
 - www.fedlink.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 Webinars

Webinars are bi-monthly:

- January, March, May, July, September, November

Next Webinar: May 28, 2019

- Topic: An Overview of Trusted Tester for Web – Version 5
- Time: 1:00 to 2:30 p.m. Eastern

This webinar series is a collaborative program between the Accessibility Community of Practice of the CIO Council and The U.S. Access Board.

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Open Question and Answer Session on the Revised 508 Standards

Bruce Bailey, Tim Creagan, Kathy Eng
U.S. Access Board

CIOC Section 508 Best Practices Webinar Series
April 30, 2019

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The U.S. Access Board



- federal agency that issues and maintains the Section 508 Standards (and guidelines under Section 255 of the Communication Act)
- Provides technical assistance and training on these requirements and ICT accessibility
- Board and GSA are charged with providing technical assistance on 508
- Has ***no authority to enforce*** 508 accessibility requirements outside the Board

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Agenda

- Presenters will review the more frequently asked questions (FAQ) about the Revised 508 Standards, and provide resources
- FAQ in four areas:
 - Scoping – What is covered?
 - Hardware
 - Software
 - Training and Testing

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Agenda (cont.)

- FAQ from email (508@access-board.gov), presentations, and those submitted for this session:
 - www.accessibilityonline.org/cioc-508/session/?id=110701
- As of 4/17 we had 26 submitted “Questions for presenters”
 - Many of those questions are addressed during the session
 - Questions are numbered, which we will mention as they are addressed
- Additional questions during and at the end of the presentation

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Scoping – What is covered?

508 Chapter 1: Application and Administration
508 Chapter 2: Scoping Requirements

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Scoping FAQ Topics

- Who must comply with Section 508?
- Alternative Means, Accommodation, Equivalent Facilitation
- Are PDFs and other file formats covered by 508?
- Whether a certain product or technology is covered as ICT

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Does a federal agency have to comply with Section 508?

- Yes!
- Section 508 (of the Rehabilitation Act) only applies to Executive Branch Federal Agencies
 - The Access Board's Revised 508 Standards impose mandatory accessibility requirements only on Federal entities
 - Applies to Federal contracts, but up to agencies to enforce
- Some Federal grant or other funding programs make compliance with 508 Standards a condition of program participation

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Use of the 508 Standards outside federal government

- Many non-federal websites are required to be accessible under other laws, such as the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, or state or local laws
- To achieve ICT accessibility, some non-federal entities incorporate, adopt, or reference the 508 Standards
- The Access Board does not make this determination
- Please consult your authoritative source for specific program information or requirements
 - Funding source
 - Relevant statutes
 - State or federal agency

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Can an agency claim that ICT is 508 conformant by merely providing an accommodation?

- No!
 - Providing human assistance or special alternate technology for a user to access ICT is a reasonable accommodation (Section 504 of the Rehabilitation Act)
- The ICT does **not** become conformant with Section 508 by providing an accommodation
 - The agency must claim an **Exception** (such as Best Meets, Undue Burden or Fundamental Alteration) *in order to comply with 508* and to use the ICT
 - *After* claiming the exception, an “Alternative Means” may be required to provide access to information and data

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What is an Alternative Means?

- **Alternative Means** is a part of the requirements for **Exceptions** for Best Meets, Undue Burden, and Fundamental Alteration
 - Excerpt from E202.6.3 (emphasis added):
 - the agency shall provide individuals with disabilities access to and use of information and data **by an alternative means** that meets identified needs
- 508 compliance includes exceptions
 - Maybe the ICT (that the agency is procuring) does not fully conform to 508 requirements found in Chapters 4 and 5
 - The agency can still be 508 compliant because they are following an exception

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Can an agency use an accommodation as Equivalent Facilitation?

- No!
 - These are two different concepts
 - Equivalent Facilitation is not an accommodation
- Equivalent Facilitation is asserted when there are novel approaches **that provide greater accessibility and usability than** would be provided by fully conforming to 508 requirements found in Chapters 4 and 5

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Covered content: Are PDFs covered by 508?

- It depends - Look to E205 Electronic Content
- All content is required to be accessible when either:
 - Public Facing (E205.2)
 - e.g., posted on the web or otherwise shared with the general public
 - Agency Official Communication (E205.3)
 - PDFs might be used in one of the covered categories (A-I)
- If content in PDF format meets E205.2 or E205.3, then it's covered!

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What about other file types?

- What about Microsoft Word or PowerPoint or Excel?
 - Same analysis as with PDF
 - If content meets E205.2 or E205.3, then it is covered!
- What about file formats that don't support accessibility?
 - Examples: native files for AutoCAD and Photoshop
- Can content be converted to a different file type which is accessible?
 - For public posting, the content might be converted to PDF or HTML
 - If business needs require a specific file type that does not support accessibility, then exception for Fundamental Alteration (E202.6) may apply

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Determining whether a product or technology is covered as ICT

- *Information Technology*. Shall have the same meaning as the term “information technology” set forth in **40 U.S.C. 11101(6)**
 - We usually refer to this as the Clinger Cohen definition for IT
- *Information and Communication Technology (ICT)*. **Information technology *and*** other equipment, systems, technologies, or processes, for which the principal function is the creation, manipulation, storage, display, receipt, or transmission of electronic data and information, as well as any associated content. Examples of ICT include...

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Determining whether a product or technology is covered as ICT

- Information and Communication Technology (ICT). Information technology ***and other...***
- In other words, **ICT is IT**
 - plus some other things like web pages that are not covered by the Clinger Cohen definition for IT
- The question: “Is this [*technology*] ICT” ***almost always boils down to*** the simpler question: “Is this [*technology*] IT”?
 - So look to the Clinger Cohen definition for IT!

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Hardware

508 Chapter 4: Hardware

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Hardware FAQ Topics

- Lab equipment
- Telephone headsets
- Pin pads and kiosks
- Desktop Printers
- Augmented and Virtual Reality

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Does 508 apply to lab equipment?

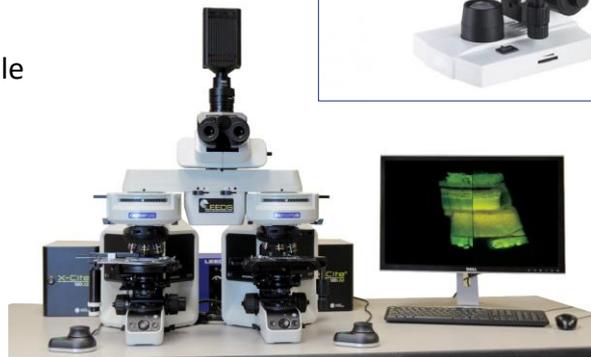
- Yes, most likely it is ICT
- 402 Closed Functionality
- 402.2 Speech-Output Enabled
 - Exception 2 – Display only status indicators
 - Exception 3 – Constraints in memory or processor
- 409 Status Indicators discernable visually and by touch or sound
- Possible Best Meets Exception



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Example: Microscopes

- No ICT function
 - 508 not applicable
- ICT function
 - Chapter 4 Hardware applies
 - Speech Output-Enabled, Operable Parts, Reach Height and Depth, Display Screens, etc.
- Connects to computer?
 - Chapter 5 Software applies
 - Speech output may be provided by AT and/or lab equipment software



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Do requirements for Interference Reduction and Magnetic Coupling apply to telephone headsets?

- Yes, if the telephone headset is capable of two-way voice communication
- No, if the telephone headset is just an accessory for ICT with two-way voice communication
 - Other Chapter 4 Hardware requirements may be applicable



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Are pin pads and self-service kiosks covered?



- Yes, 402 Closed Functionality
 - 402.2 Speech-Output Enabled
 - Not all hardware needs speech to be usable by someone who is blind
 - Exceptions allow for discernible by touch
- Other Chapter 4 Hardware requirements would be applicable
 - Operable Parts: Numeric Keys
 - Reach Height and Depth
 - Screen Contrast

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How do the reach and Braille requirements apply to a desktop printer?

- Reach range applies to stationary ICT
 - Agency is responsible for shared printers being in accessible locations
- Speech output may be provided by AT and/or printer software
 - Chapter 5 Software requirements
 - Braille instructions for initiating the speech mode do not have to be embossed on hardware



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Augmented (AR) vs Virtual Reality (VR)

AR: Real-world environment

- Adds or masks objects
- Alters user's reality



VR: Computer-generated environment

- Replaces the user's real world with a simulated environment



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What are the requirements for AR and VR?

- What are the 508 requirements for the hardware?
 - 402 Closed Functionality
 - 407 Operable Parts – Input Controls, Contrast, Reach Range
 - VR haptic sensations through a controller
 - 408 Display Screens
 - VR and AR headsets
 - 402 Sounds and 413, 415 Captions
 - 409 Visual indicators and 414, 415 Audio Description
- If not closed (AR), Software (Chapter 5) requirements may apply
- Possible Exception (E202.7 Best Meets) for commercial non-availability

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Software FAQ

508 Chapter 5: Software

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Software FAQ Topics

- Chapter 5 Software requirements versus WCAG 2.0
- WCAG 2.1
- Apps and Mobile
- Maps and GIS
- AT Interoperability and Accessibility Services
 - 502.3.1 through 502.3.14

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When do I use WCAG? When do I use Chapter 5?

- Is there a lot of overlap between WCAG and Chapter 5?
 - Yes, but there are no conflicts or contradictions
- Does software on the web follow Chapter 5 requirements or WCAG?
 - Software on the web should use WCAG 2.0 Level AA
 - WCAG was developed for robust interactive web applications as well as static HTML pages

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What is “Web Software” anyway?

- Revised 508 Standards include definitions for:
 - Software
 - Non-Web Software
 - Web page
- Should “web software” follow Chapter 5 requirements or WCAG?
 - Use WCAG for:
 - Software running in or launched by your web browser
 - Use Chapter 5 for MS Windows and Apple OS applications
 - Software might require an Internet connection, but it’s still not a “Web page”

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Do Section 508 and WCAG 2.0 apply to apps? What about mobile?

- Yes!
- “Apps” or applications are software (mobile and desktop)
 - Software is defined at E103.4
- Also see E207:
 - Where components of ICT are software and transmit information or have a user interface, they shall conform to the requirements in Chapter 5 Software and conform to WCAG 2.0 Level A and AA Success Criteria and Conformance Requirements

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What do I do about maps and Geographical Information Systems (GIS)?

- Software needs to follow WCAG 2.0 Level AA
- Maps are hard to make fully accessible!
 - Conveying a useful textual equivalent of robust visual information is not something we know how to do. Do the best you can!
- The general requirement from SC 1.1.1 is that there be a “text alternative that serves the equivalent purpose”
 - However, SC 1.1.1 also allows providing only descriptive identification for non-text content that is “primarily intended to create a specific sensory experience”
- Other accessibility requirements (e.g., navigation via the keyboard) are applicable

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Would a web application ever have to meet more requirements than are in WCAG?

- If the web application plays videos
 - 503.4 (User Controls for Captions and Audio Description) applies
 - WCAG already requires captioning and audio description
 - It would be unusual for there not to be an option to turn on/off CC/AD
- If the web application lets you create content
 - 504 (Authoring Tools) applies
- Chapter 6, Support Documentation and Services, is probably applicable

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Does 508 require WCAG 2.1?

- No! The Revised 508 Standards cite to WCAG 2.0 *only*
 - Incorporation by reference is to a specific dated version (Dec. 11, 2008)
 - This will not change without a formal rulemaking process
- WCAG 2.1 adds requirements to WCAG 2.0
 - 2.1 adds accessibility requirements specific to mobile and touch UI
 - If a website conforms to WCAG 2.1 Level AA, it will conform to WCAG 2.0 Level AA
- Conformance with WCAG 2.1 is optional and not required for 508

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Accessibility Services: 502.3.1 through 502.3.14

- Does the Access Board have supplemental guidance?
 - No
- Developers should look to the accessibility services provided in platform documentation
- Requirements originate from our advisory committee and the extensive public comments the Access Board received
- Requirements are adapted from the established best practices of multiple platform owners (e.g., Microsoft, Oracle, IBM, Apple)

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Training and Testing

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Training from Access Board

- The Access Board can provide training on the standards and guidelines that we promulgate
 - To request training from us, visit www.access-board.gov/training
- Access Board's Section 508 Best Practices Webinar Series
 - See schedule and archives
 - www.accessibilityonline.org/cioc-508

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Where else can I get 508 training?

- W3C Introduction to Web Accessibility
 - www.w3.org/WAI/fundamentals/accessibility-intro
- WCAG 2 Quick Reference
 - www.w3.org/WAI/WCAG20/quickref
- GSA's Section508.gov Training
 - www.Section508.gov/training

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Is there an “official 508 Certification”?

- There is no official Section 508 certification or license for a person
- DHS Trusted Tester – ACOP supported test methodology
 - <http://section508.gov/test/trusted-tester>
 - Online training and exam certification
 - DHS Accessibility Help Desk: accessibility@hq.dhs.gov

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Is there a 508 stamp or icon?

- No, there is no official 508 symbol to indicate conformance of a product



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Documenting 508 Conformance — VPATS

VPAT is an Information Technology Industry Council initiative

- www.itic.org/policy/accessibility/vpat

Q. What to do with VPATs that cite original Section 508 Standards (2000)?

- A. Those VPATs are outdated and not usable
- Current VPATs reference Revised 508 Standards

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Questions from the Audience?



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Resources and Contact Information

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Resources

- Revised 508 Standards:
 - www.access-board.gov -> [ICT Refresh](#) -> [Final Rule](#) -> [Single File Version](#)
- Making the Web Accessible — www.w3.org/WAI
 - Strategies, standards, and supporting resources to help you make the Web more accessible to people with disabilities
- Test for Accessibility — www.section508.gov/test

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Contact us!
U.S. Access Board

800-872-2253 (voice), 800-993-2822 (TTY)
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**Thank you for participating in
today's webinar**



Next session:

May 28, 2019

An Overview of Trusted Tester for Web – Version 5

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