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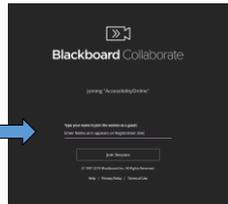
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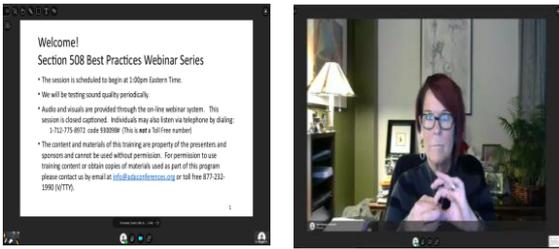
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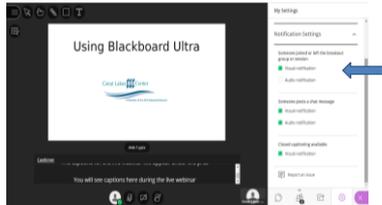
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Example: Side by side – Two Different Browser Windows open simultaneously and resized



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Q&A about the Revised Section 508 Standards with the Access Board and GSA

Bruce Bailey, Tim Creagan, Access Board
Michael Horton, GSA

CIOC Section 508 Best Practices Webinar Series
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Introduction

- The U.S. Access Board and the General Services Administration are the federal agencies responsible for responding to technical assistance Standards and guidelines
- We maintain a technical assistance hotline at the Access Board where we respond to emails and phone calls asking us about Section 508 of the Rehabilitation Act
- The Access Board has **no authority to enforce** 508 accessibility requirements

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Agenda

- Topics to address:
 - Scoping – What is covered?
 - Hardware
 - Software
 - Testing
 - Acquisitions
- Questions submitted in advance are found on the registration page: www.accessibilityonline.org/cloc-508/session/?id=110777
- Submit questions during the webinar in the chat box in the lower left-hand corner of your screen.

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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

- Is there a dollar amount for an “Undue Burden”?
- Who must comply with Section 508?
- Accommodation, Alternative Means, Equivalent Facilitation
- Are PDFs and other file formats covered by 508?
- Accessible Content
- Conforming Alternate Version

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Scoping – Is there a dollar amount for an “Undue Burden”(E202.6)? (Q16)

- No – must evaluate a variety of factors:
- E202.6.1 Basis for Determination of an Undue Burden
 - In determining whether conformance to requirements ... would impose an undue burden on an agency, the agency shall consider:
 - the extent to which conformance would impose significant difficulty or expense
 - Considering the agency resources available to the program or component
 - for which the ICT is to be procured, developed, maintained or used.

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Does Section 508 apply to my website?

- What websites or businesses are exempt from section 508 accessibility? (Q7)
- How does an organization such as State Government integrate the provisions of § 508? (Q8)

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Do I have to comply with Section 508?

- Section 508 (of the Rehabilitation Act) only applies to federal agencies in the Executive Branch
 - 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 makes compliance with 508 Standards a condition of program participation

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Use of the Section 508 Standards outside Federal government

- Some non-federal entities incorporate, adopt, or reference the Section 508 Standards as their benchmark for ICT accessibility
 - The Access Board does not make this determination
 - We are unable to tell you whether our Section 508 Standards apply to your ICT through some other law or policy
- Please consult your authoritative source for specific program information or requirements
 - Funding source
 - Relevant statutes
 - State or federal agency

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Answer: Does Section 508 apply?

- Private sector: Section 508 does not directly apply to private sector websites or businesses, unless they are creating websites for a federal agency.
- For most private sector business websites, See ADA. If it is covered by Title II or Title III, it must communicate effectively, meaning that the website content should be accessible.

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How much effort do I have to put into complying with Section 508?

- Title II of ADA covers state and local governments
 - State and local governments must “effectively communicate” about their programs and services
 - Consult DOJ if a definitive answer is needed
- How does an organization such as a state government integrate the provisions of § 508 as it applies to access by employees with disabilities to internal information? (Q8)
 - For Federal agencies, 508 covers “Agency Official Communication” (E205.3)
 - If your state government “follows 508” then those categories are the minimum for “internal information”
 - Remember that 508 is proactively for all EIT, it is not an accommodation

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How much effort do I have to put into complying with Section 508? (Q8)

- What constitutes “reasonable” in that context?
- How far are we supposed to go when it comes to complex information on forms, network diagrams, etc.?
 - “Reasonableness” – goes to the level of effort
 - Advisable to seek clarification from DOJ guidance
 - Under Section 508, look to conformance under WCAG 2.0 for guidance
 - WCAG 2.0 conformance may be easier than you think at first!
 - Section 508 includes exceptions
 - Focus efforts on new materials before legacy documents

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Can I wait to provide accessible versions until I am asked?

- Not under Section 508!
 - Section 508 requires **proactive** accessibility
 - Providing special assistance or assistive technology is a reasonable accommodation (Section 504 of the Rehabilitation Act)
 - Willingness to provide accommodations upon request is not enough for 508 compliance
- What about exceptions like Best Meets and Undue Burden and Fundamental Alteration Exceptions?
 - Those exceptions all mention Alternative Means
 - What is the difference between an accommodation and Alternative Means?
 - Can I use an accommodation as Equivalent Facilitation?

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What is the difference between an accommodation and Alternative Means?

- Exceptions for Best Meets, Undue Burden, and Fundamental Alteration require **Alternative Means**. Excerpt from E202.6.3:
 - “the agency shall provide individuals with disabilities access to and use of information and data by an alternative means that meets identified needs”
- The exception must be **approved** (justified, documented, planned alternative means) **in order to be considered 508 compliant**
 - With this example, the agency is buying ICT that is not 508 conforming, but the agency is 508 compliant through an exception
- Reasonable accommodation can be part of the Alternative Means

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Can I use an accommodation as Equivalent Facilitation?

- No!
 - These are two different concepts
 - Equivalent Facilitation is not an accommodation
- Equivalent Facilitation is asserted when you have novel approaches **that are better than** minimal baseline conformance
- E101.2 Equivalent Facilitation
 - The use of an alternative design or technology that results in substantially equivalent or greater accessibility and usability by individuals with disabilities than would be provided by conformance to one or more of the requirements in Chapters 4 and 5 of the Revised 508 Standards is permitted.
 - The functional performance criteria in Chapter 3 shall be used to determine whether substantially equivalent or greater accessibility and usability is provided to individuals with disabilities.

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Accessible videos (Q6)

- Does Section 508 require identifiers in the captions for each speaker?
- Are summaries of non-critical audible information (e.g., [Music] or [Background Speech]) acceptable?
- Should the words of the music / background conversations be included in the captions to the extent they are audible?

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Answer: Accessible videos

- If content is **essential for the comprehension of content**, it needs to be captioned.
 - If sounds in context are less important, captions use musical notes symbols ♪ ♫ or short text in brackets, e.g. [music]
 - Song lyrics need not be captioned unless they are important to action or dialog; e.g., a character on-screen comments on the song
 - Often the title of background music is displayed in the captions
- Speaker names should be identified when they talk
 - This is especially important when the speaker is off-screen

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Covered content: Does Section 508 cover PDFs? What about Word or PowerPoint?

- It depends! Look to E205 Electronic Content
- PDFs are required to be accessible when either:
 - Public facing – e.g. posted on the web or otherwise shared with the general public (E205.2)
 - Agency Official Communications – When PDF meets one of the covered categories (A-I) (E205.3)
- Some covered categories (A-I) are common uses of PDFs (e.g. Training Materials)
 - Some are hard to imagine (e.g. using PDF as an emergency notification)
- What about files from Microsoft Word or PowerPoint?
 - Same analysis as with PDF

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Covered Content – Other File Types

- What about files from AutoCAD/Photoshop/etc.?
- All content is required to be accessible when either:
 - Public facing (posted on the web) or Agency Official Communication (categories A-I)
- Formats like AutoCAD and Photoshop:
 - Requirements for Electronic Content (E205) are different than the requirements for Software (E207)
 - Files from software like AutoCAD and Photoshop typically are converted to other formats (i.e., PDF or HTML) before sharing with the general public
 - It would be a Fundamental Alteration to require something other than the native file format needed by the software

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Can I assert cost as an undue burden?

- As a general rule, an agency is taking a bit of a risk by asserting cost as a reason for not providing accessible content
- Historically, assertions of Undue Burden (see E202.6) have a high bar to meet
- In addition, the agency must still provide access to and use of information and data by an alternative means that meets identified needs

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Does every version have to be accessible?

- No, because WCAG 2.0 permits “conforming alternate versions”
- Consider the case of a very complicated PDF
 - Consider the possibility of making the source files available (if those are reasonably accessible)
 - Or publish an edition in HTML (which may be less labor intensive).
- Section 508 and WCAG 2.0 do not require that *all* formats and every version be accessible, just one version of content
 - Asserting that conforming alternate versions of the materials are being provided is more proactive than merely claiming that no accessible versions are being provided because of a lack of money by the agency
 - There are important caveats for an alternative format to meet WCAG definition for CAV
 - For more information, see: www.w3.org/tr/understanding-wcag20/conformance.html

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Hardware

508 Chapter 4: Hardware

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How to evaluate hardware products?

- Are there any websites that can provide a more robust explanation on how to evaluate hardware products? (Q14)

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Answer: Evaluating Hardware

- Evaluating websites (and documents) seems more mature than hardware
- Hardware accessibility has longer history than software and documents!
- Online tools:
 - VPAT 2 includes hardware checklist: <http://itic.org/policy/accessibility/vpat>
 - GSA ART: <http://buyaccessible.gov>

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Software

508 Chapter 5: Software

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Software FAQ Topics

- How can I make a map application accessible?
- What are Chapter 5 Software requirements versus WCAG 2.0
- Maps and GIS
- Would a web application ever have to meet more requirements than there are in WCAG?

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How can I make maps accessible? (Q5)

- Some geospatial web-based applications and web maps do not have the technology to meet Section 508 compliance, but they are important for distributing information to the many.
 - What are some examples of providing alternate source of information or contacts in this situation?
 - Does Section 508 prevent the government from using these beneficial applications to share data and information to the larger population or Agency?

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What to do for maps and GIS? (Q5)

- Meet the accessibility requirements that you can!
 - At least provide descriptive identification for visuals
 - Provide good keyboard accessibility
 - Provide as much visual contrast as possible, and pay attention to color blindness
 - Great resource: ColorBrewer.org
- Other WCAG 2.0 success criteria will also be applicable

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Maps & Graphical Information Systems (GIS)

- Maps and GIS are a challenge to make accessible!
- What is the base requirement? From WCAG 2.0 SC 1.1.1:
 - If non-text content is primarily intended to create a specific sensory experience, then text alternatives at least provide **descriptive identification** of the non-text content.
 - Providing descriptive identification is not that difficult!
- Section 508 include a general exception for when accessible software is not commercially available
 - See E202.7 Best meets
 - Conduct analysis, provide documentation, and provide alternative means

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What about alternate sources? (Q5)

- What are some examples of providing alternate source of information or contacts for maps and GIS?
 - Make the raw data available
 - Spreadsheet or CSV or XML
 - Someone else might figure out an innovative way to make the information accessible
 - Provide contact information
 - It won't just be people with visual impairments that have trouble using your maps!
- Section 508 does **not** prevent the government from using these sort of applications!
 - Meeting the standards is subject to being "consistent with the agency's business needs"

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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 4?
 - Yes, but there are no conflicts or contradictions
- Does software on the web follow Chapter 5 requirements or WCAG?
 - Web software should use WCAG 2.0 Level AA
 - WCAG was developed for robust interactive web applications as well as static HTML pages
 - Ask: Is it software running in or launched by your web browser?
 - Use WCAG
 - Ask: Is it desktop software that needs an internet connection?
 - Use Chapter 5

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

- Yes, possibly, depending on the nature of the web application
- If the web application plays videos:
 - 503.4 User Controls for Captions and Audio Description
 - This provision reflects common practices
 - No real-world examples of web videos (with CC or AD) without prominent controls
- If the web application lets you create content:
 - 504 Authoring Tools
- Chapter 6 – Support Documentation and Services – is also applicable

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Testing

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Testing Topics

- What version of JAWS does CMS support?
- Using JAWS to test Web Accessibility
- Automated Accessibility Checkers
- Sufficiency of testing for accessibility
- Color Contrast (SC 1.4.3)
- Meaningful Sequence (SC 1.3.2)

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What is the latest version of JAWS which CMS supports? (Q3)

- Acronyms:
 - JAWS: popular screen-reading software
 - CMS: Centers for Medicare and Medicaid Services, a component of HHS (Department of Health and Human Services)
 - CDC: Center for Disease Control, another component of HHS
- Should I use AT for testing for accessibility?
 - What role does the *version* of the AT play in this process?

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JAWS and CMS – Answer

- Your customer may want testing with AT
 - If so, ask if customer has specific version in mind
 - If you test with AT, note the version of AT used
- In general, developers should code to the Section 508 Standards.
- HHS and CMS have strong programs that goes beyond minimums set by the Revised 508 Standards
 - CMS is a customer that likes to see testing with AT
- HHS CDC practice (internal and external):
 - IE11 and current version of JAWS, ZoomText, and Dragon NS
 - Chrome (latest) and NVDA (latest), or previous major version of JAWS, ZoomText, and Dragon NS

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Using JAWS to test web accessibility? (Q10)

- Is there a Tips Quick Reference Card for those new to using JAWS to test computer-based instruction?
- In the Federal space (and with Trusted Tester) testing with AT is **not** recommended!
 - It is hard for sighted users to use screen reading software correctly
- Vispero provides specific support for sighted testers who want to use JAWS
 - <http://pacielogroup.com/products/jaws-inspect>

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What about automated accessibility checkers?

- Most software content products on the market include built-in accessibility checkers!
 - The accessibility checkers are excellent!
 - Still, many false negatives and false positives
 - Human review is still needed!
- If I check my remediated PDFs with an automated PDF accessibility checker, how do I know whether the document is compliant?
 - Automated checks will never tell you if your alt tag is **good**
 - Manual checks catch items that may otherwise be missed
 - Use developer resources provided for the automated checker

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Automated versus Manual Testing

- There is no automated test that can assure conformance
- One needs to use the requirements (i.e., WCAG 2.0 Level A and AA success criteria) as a checklist
- Majority of requirements need human evaluation
 - Example: alternative text
 - An automated tool can flag images that are missing an alt attribute, but no automated tool can say if the supplied alt attribute value is providing a text equivalent or not
- There is a standard, PDF/UA, that certifies that a PDF is accessible
 - Ask your service provider or software developer if they can offer that designation

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When testing a site,

- Is there a recommendation for the number of pages and PDFs tested to certify that the site is accessible?

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Answer: What are sufficient tests? 1/2

- Just for clarification, there isn't a certification that a Web site is accessible or Section 508 conformant
- For Section 508 conformance, we reference W3C's WCAG 2.0 and "Understanding Conformance"
- What does WCAG mean where it states, "Conformance to a standard means that you meet or satisfy the 'requirements' of the standard."
- In WCAG 2.0 the 'requirements' are the Success Criteria
 - To conform to WCAG 2.0, you need to satisfy the Success Criteria, that is, there is no content which violates the Success Criteria"

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Answer: What are sufficient tests? 2/2

- Understanding Requirement 2: Full pages:
 - Conformance (and conformance level) is for full Web page(s) only and cannot be achieved if part of a Web page is excluded
 - For the **site** to be Section 508 conformant, the entire site must meet all requirements
 - When testing your site for conformance, all site content should be tested
- In practice, testing of all content may be limited by availability of resources
 - Your agency may have testing procedures to indicate the acceptable level of testing and/or guidance on selection of content to be tested
 - for example, frequently visited pages or files
 - Strategic sampling is useful especially when manual testing is necessary
 - However, because sampling does not cover all content, it is possible that issues will be missed

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SC 1.4.3 Contrast (minimum)

- What free tools are available for testing color contrast for web-based training? (Q11)

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Answer: Color Contrast Testing

- WebAIM Contrast Checker:
 - <http://webaim.org/resources/contrastchecker>
- Juicy Studios Luminosity Colour Contrast Ratio Analyser
 - <http://juicystudio.com/services/luminositycontrastratio.php>
- Paciello Group Color Contrast Analyzer (CCA):
 - <http://developer.pacielogroup.com/resources/contrastanalyser>
- ANDI (Accessible Name & Description Inspector)
 - <https://www.ssa.gov/accessibility/andi/help/install.html>

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Testing SC 1.3.2 Meaningful Sequence (Q13)

- My understanding is that 1.3.2 is best tested by turning off CSS, and the screen is read without the style sheets to ensure the DOM is coded in correct order.
- However, as most screen readers now understand style sheet technology, is this requirement outdated?
- Or am I misinterpreting it and it applies to tabbing through the screen with the style sheets on?

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Answer: Testing SC 1.3.2 Meaningful Sequence (Q13)

Testing accessibility by disabling CSS was a good strategy with the Original Section 508 Standards (and with WCAG 1.0)

- Disabling CSS as means for testing WCAG 2.0 SC 1.3.2 is not recommended
- Most screen reading software does well with style sheet technology
- "When the sequence in which content is presented affects its meaning, a correct reading sequence can be programmatically determined."
 - Colloquially: There is a logical reading order
 - Also applies to content that is not interactive, so just tabbing through a webpage might miss something.
 - See [Understanding 1.3.2](#) link from WCAG 2.0.

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Acquisitions

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Acquisition Topics

- What does Section 508 say about procuring AT?
- How can I vet ICT before procuring it?
- Does GSA have sample requirements documents to share?

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What does Section 508 say about procuring AT? (Q13)

- What are the Chapter 2 scoping requirements regarding procuring assistive technology products/programs?
- Do these products and services need to go through a rigorous review?
- Is there some leniency since they're used to enhance or increase accessibility?

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Answer: Procuring AT under Section 508

- One requirement specific to AT:
 - 503.3 Alternative User Interfaces
 - Where an application provides an alternative user interface that functions as assistive technology, the application shall use platform and other industry standard accessibility services.
- Broad exceptions for AT!
 - E207.1 General EXCEPTION
 - Software that is assistive technology and that supports the accessibility services of the platform shall not be required to conform to the requirements in Chapter 5
 - E207.2 WCAG Conformance EXCEPTION 1
 - Software that is assistive technology and that supports the accessibility services of the platform shall not be required to conform to E207.2

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How can I vet ICT before procuring it? (Q4)

- What are some good practices for vetting ICT before purchase?
- Yes, request a "Accessibility Conformance Report(ACR)"
 - Commenter notes: Unfortunately VPATs are not always reliable or well-done
 - Is ACR using VPAT 2 template?
- Look for any product descriptions either from reps or from the website.
- Know what tasks/functions you are asking the ICT to perform and compare those against the 508 and WCAG 2.0 requirements.
- Get an evaluation copy for your own accessibility testing.

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Question: Do you have sample requirements documents that you can share?

- Question: We are working to ensure our solicitation language properly addresses 508 Compliance. In the past we have included some general language....however, we recently have had discussions where we are not sure how compliance is determined. Do you have sample requirements documents that you can share?
- Answer: Section 508 solicitation language should be tailored to each procurement. Recommend using the Accessibility Requirements Tool (ART) which is a web-based application that will help determine the Section 508 requirements that apply to acquisitions of Information and Communication Technology (ICT) products and services.

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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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Where 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
 - Authoring guides, checklists, videos www.Section508.gov/create/
 - Training www.Section508.gov/training
- DHS Trusted Tester Training and Certification
 - dhs.gov/trusted-tester

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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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Question: Is there an IT Accessibility/508 Community?

Answer: YES

- The **IT Accessibility Community of Practice** (508 CoP) consists of U.S. Government professionals who work to enhance access to federal information technology (IT). We identify and promote best practices for compliance with Section 508 law, and conformance to the Revised 508 Standards. We share successful practices and information, and engage advocacy groups, industry, and academia around innovative solutions for accessible technology.
- Subscribe: Email the Government-wide IT Accessibility Team at section.508@gsa.gov to join the 508 listserv. You **must** have an official government email address (e.g., .gov or .mil) to join.

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Contact us!

U.S. Access Board
800-872-2253 (voice), 800-993-2822 (TTY)
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GSA 508 Team
Office of Government-wide Policy
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Accessible Social Media

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