

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.

1

1

Section 508 Best Practices Webinars

Webinars are bi-monthly:

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

Next Webinar: November 24, 2020

- Topic: Creating accessible websites using the U.S. Web Design System (USWDS) and the 21st Century Integrated Digital Experience Act (IDEA)
- 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.

2

2

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3

3

MANAGING FOR ACCESSIBILITY THROUGHOUT THE ACQUISITION LIFECYCLE

United States Access Board
Section 508 Best Practices
Webinar

September 29, 2020



Betsy Sirk
National Aeronautics and Space
Administration

John Sullivan
Andrew Nielson
General Services Administration

4

Today's Presenters:

- Andrew Nielson, ICT Accessibility Subject Matter Expert, General Services Administration, Office of Government-wide Policy
- Betsy Sirk, Information Technology and Section 508 Program Manager, National Aeronautics and Space Administration
- John Sullivan, Program Director, Government-wide Section 508 Program, General Services Administration, Office of Government-wide Policy



5

5

Agenda

- Accessibility Requirements In The U.S. Government
- Acquisition Overview
- Ensuring Accessibility in the Acquisition Process
 - *New Contracting*
 - *Acquisition of COTS Solutions*
- Best Practices
- Resources



6

6

Accessibility Requirements in the U.S. Government

- Section 508 of the Rehabilitation Act of 1973 amended in 1998 to address Information and Communication Technology (ICT)
 - *Technical standards issued in 2001; revised standards published in 2017*
 - *Revised standards added World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG 2.0) by reference, which applies to both web and non-web electronic content and software*
 - *Revised standards address all ICT including hardware, software, electronic content, documents, and help desk services*
 - *Applies to ICT that is "procured, developed, maintained, or used" by agencies of the Federal government*
- Section 508 requires that Federal agencies make technology accessible to employees and members of the public who have disabilities in a comparable manner to those without disabilities
- Information and Communication Technology (ICT) must provide equivalent access for those:
 - *Without vision, with limited vision, or without perception of color;*
 - *Without hearing, with limited hearing;*
 - *Without speech;*
 - *With limited manipulation, with limited reach and strength;*
 - *With limited language, cognitive, and learning abilities*



7

7

Acquisition Overview

- Federal acquisition processes for procuring ICT solutions provide **key opportunities to ensure that the goals of Section 508 are met**
- Building accessibility into acquisitions will:
 - *Enable workforce productivity*
 - *Improve customer experience*
 - *Prevent the risk of litigation costs*
 - *Prevent expensive retrofitting ICT solutions*
 - *Allow those with disabilities an equal footing*
- Including accessibility requirements in acquisitions dependent on:
 - *What is being procured: Commercial Off The Shelf (COTS) software, custom software development, IT support services, etc.*
 - *How it's being procured: full and open competition, requests for proposals, requests for quotes, established Government-wide Acquisition Vehicles (GWAC) or schedules, purchase card*
- One size does not fit all



8

8

New Contracting (1 of 2)

Step 1: Determine accessibility requirements

- Understand which standards apply to the specific procurement

Step 2: Conduct market research

- Identify accessible products or services available within the market

Step 3: Develop solicitation language

- Include specific relevant accessibility requirements, contract terms and conditions for testing and validation, and expectations throughout the contract period of performance if applicable



9

9

New Contracting (2 of 2)

Step 4: Evaluate Each Proposal To Validate Vendor Claims Against Your Stated Accessibility Requirements

- Trust but verify
- Test for accessibility

Step 5: Validate Compliance Over Time (If an Ongoing Contract)

- ICT must remain accessible throughout the contract period of performance
- As ICT solutions are updated, re-test each new version against the Section 508 requirements originally established in the contract



10

10

Acquisition of COTS Solutions (1 of 2)

Step 1: Requiring official identifies specific product or service to be purchased and acquisition method (existing contract vehicles or purchase cards*)

- Determine if a Section 508 exception applies; if not proceed to step 2
 - E202.3 National Security Systems
 - E202.4 Federal Contracts
 - E202.5 ICT Functions Located in Maintenance or Monitoring Spaces (status indicators and operable parts)

Step 2: Obtain an Accessibility Conformance Report (ACR)

- Request ACR from vendor
 - ACR developed by vendor using the IT Industry Council's Voluntary Product Accessibility Template (VPAT™) Version 2.x
 - Certain Government-wide Acquisition Contract (GWAC) vehicles facilitate obtaining ACR from industry (e.g. NASA SEWP requires contract holders to provide ACR at time of quote upon request)

Step 3: Evaluate ACR to determine overall level of conformance

- Full Conformance = all applicable technical standards are fully supported
- Partial Conformance = not all applicable standards are fully supported
- Non-Conformance = most applicable standards are not fully supported

* See Micro-Purchase Training Course on Section508.gov



11

11

Acquisition of COTS Solutions (2 of 2)

Step 4: If not "Full Conformance," determine if more conformant alternatives are available

- Review ACRs of comparable products

Step 5: Determine possible exceptions*

- E202.6 Undue Burden
- E202.6 Fundamental Alteration
- E202.7 Best Meets
- Develop Exception documentation as required
- Purchase Product

Step 6: Provide individuals with disabilities access to and use of information and data by an alternative means as needed

* NOTE: Applicability of exceptions is never determined by industry - only by government



12

12

Best Practices (1 of 3)

- Collaboration among Office of Chief Information Officer/Section 508 Program Managers, acquisition experts, customers, and industry yields accessible solutions that are available and responsive to needs
- Identifying accessibility requirements early in the acquisition lifecycle prevents costly rework
- Use GWAC vehicles or other existing government contract solutions which facilitate obtaining ACRs
- Remember to obtain revised ACRs as ICT solutions are updated



13

13

Best Practices (2 of 3)

- Determine if accessible solutions are available by reviewing ACRs, visiting vendor websites, and by collaborating with colleagues
- Inform industry that government requires ACRs and evaluates proposals for Section 508 compliance
- When developing solicitation, use Accessibility Requirements Tool (ART) and Section 508 checklists where possible to help identify requirements

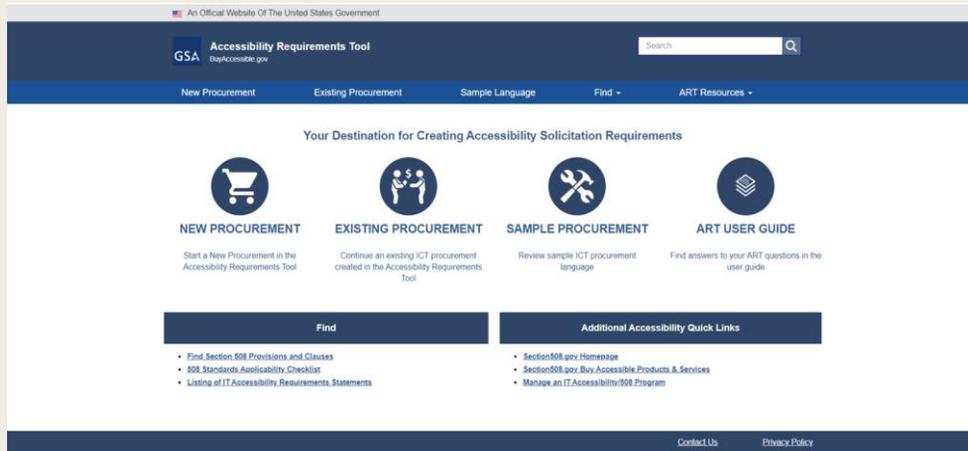


14

14

Best Practices (3 of 3)

The Accessibility Requirements Tool (ART) automates the process of generating accessibility requirements for procurements



15

Resources

- Section508.gov: <https://www.section508.gov/>
- About the Section 508 Standards refresh: <https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh>
- Complete New Section 508 Standards and Appendices: <https://www.govinfo.gov/content/pkg/CFR-2017-title36-vol3/xml/CFR-2017-title36-vol3-part1194.xml>
- NASA Solutions for Enterprise-Wide Procurement: <https://www.sewp.nasa.gov/>
- Accessibility Conformance Report (ACR) Template / VPAT: <https://www.itic.org/policy/accessibility/vpat>
- 21st Century Integrated Digital Experience Act (via Digital.gov): <https://digital.gov/resources/21st-century-integrated-digital-experience-act/>

16

16

Questions from the Audience?



17

17

Questions? Contact us!

- Andrew Nielson, ICT Accessibility Subject Matter Expert, General Services Administration, Office of Government-wide Policy
Andrew.nielson@gsa.gov
- Betsy Sirk, Information Technology and Section 508 Program Manager, National Aeronautics and Space Administration
betsy.sirk@nasa.gov
- John Sullivan, Program Director, Government-wide Section 508 Program, General Services Administration, Office of Government-wide Policy
john.j.sullivan@gsa.gov



18

18

Thank you for participating in today's
webinar



Next session:

November 24, 2020

Create Accessible websites using the U.S. Web Design System (USWDS)
and the 21st Century Integrated Digital Experience Act (IDEA)

19

19