

# 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](http://www.adaconferences.org/CIOC/archives) and
- [www.fedlink.org/allqual/resource-shared-webinars.cfm](http://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](http://www.Section508.gov).

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# Section 508 Best Practices Webinars

Webinars are bi-monthly:

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

Next Webinar: March 30, 2021

- Topic: Review of the Revised 508 Standards (Part II): Requirements for Hardware and Software
- 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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## Review of the Revised 508 Standards (Part 1): Requirements for Federal Websites and Electronic Content

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

CIOC Section 508 Best Practices Webinar series  
January 26, 2021

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# Agenda

- I. Overview of Accessibility Standards used when making websites and electronic content accessible:
  - Revised 508 Standards (2017)
  - WCAG 2.0 (Web Content Accessibility Guidelines) (2008)
- II. Accessible websites
- III. Synchronized Media
- IV. Video Conferences
- V. Questions and Answers
- VI. Resources

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## I. Accessibility Standards

- Section 508 of the Rehabilitation Act (2017)
- WCAG 2.0 Success Criteria and Conformance Requirements (2008)

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## Section 508 of the Rehabilitation Act (2017)

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## Information and Communication Technology Standards and Guidelines: 36 CFR Part 1194

### Appendix A

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

### Appendix C

- Chapter 3: Functional Performance Criteria
- Chapter 4: Hardware
- Chapter 5: Software
- Chapter 6: Support Documentation and Services
- Chapter 7: Referenced Standards

### Appendix D

- EIT Accessibility Standards as Originally Published on December 21, 2000

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## E103.4 Defined Terms “ICT” and “IT”

### **ICT** – (Information and Communication Technology)

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.

Some Examples - computers and peripheral equipment; information kiosks and transaction machines; telecommunications equipment; software; applications; Web sites; videos; and **electronic documents**.

IT (Information Technology) – same meaning as 40 U.S.C. 11101(6)

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## E103.4 Defined Terms “Content” and “Public facing”

**Content** – Electronic information and data, as well as the encoding that defines its structure, presentation and interactions.

**Public Facing** – Content made available by agency to members of the general public.

Some examples - agency Web site, blog post or social media

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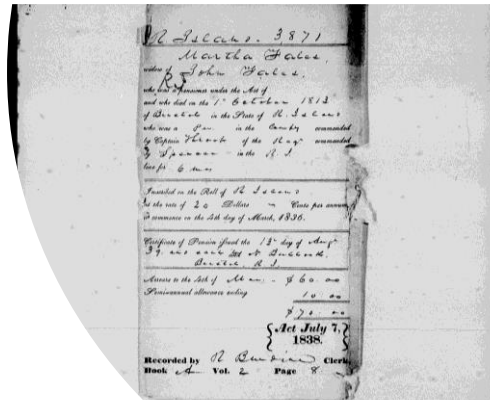
## E205 Electronic Content (What's Covered)

### E205.2 Public Facing

- Electronic content that is public facing

### E205.3 Agency Official Communication

- Electronic content that is *not* public facing



**Exception for NARA records  
that are not public facing**

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## E205.3 Agency Official Communications Nine Categories

- A. An emergency notification
- B. An initial or final decision adjudicating an administrative claim or proceeding
- C. An internal or external program or policy announcement
- D. A notice of benefits, program eligibility, employment opportunity, or personnel action
- E. A formal acknowledgement of receipt
- F. A survey questionnaire
- G. A template or form
- H. Educational or training materials
- I. Intranet content designed as a Web page

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## E208 Support Documentation and Services (What's covered?)

### E208.1 General

- Where an agency provides support documentation or services for ICT, such support shall conform to Chapter 6 Support Documentation and Services

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## Chapter 6 Support Documentation and Services

### 602 Support Documentation

- 602.2 Accessibility and Compatibility Features – documentation shall list and explain how to use accessibility and compatibility features, both built-in and used with AT
- 602.3 Electronic Support Documentation – conform to WCAG 2.0
- 602.4 Alternate Formats-non-electronic format must be provided in alternate formats usable by individuals with disabilities

### 603 Support Services – e.g., help desks, call centers, training services, automated self-service technical support

- 603.2 Accessibility and Compatibility Features – ICT support services shall provide information on the accessibility and compatibility features, both built-in and used with AT
- 603.3 Accommodation of communication needs – communicate directly with the user, accommodating their communication needs

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## E103.4 Defined Terms “Software” and “Non-Web Software”

**Software** – Program, procedures, rules, and related data and documentation that direct the use and operation of ICT and instruct it to perform a given task or function. Includes, but not limited to, applications, non-Web software and platform software.

**Application** – Software designed to perform or help user to perform a particular task

**Non-Web Software** - Software that is

- not a webpage
- not embedded in a web page, and
- not used in the rendering or functioning of web pages.

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## E103.4 Defined Terms “Platform Software”

**Platform Software** – Software that interacts with hardware or provides services for other software. A single software component may have both platform and non-platform aspects.

P/S may run or host other software

P/S may isolate other software from underlying software or hardware

Examples:

- Desktop O/S
- embedded O/S (including mobile systems)
- Web Browsers;
- Plug-ins to web browsers that render particular media or format
- Sets of components such as applications supporting macros or scripting

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## E207 Software (What's covered?)

### E207.1 General

- Components of ICT are software and transmit information or have a user interface shall conform to E207 and Chapter 5
  - EXCEPTION: Software that is AT and supports the accessibility services of the platform need not conform to the requirements in Chapter 5

### E207.2 WCAG Conformance

- User interface components, content of platforms and applications shall conform to WCAG 2.0 Level A and AA SC and Conformance Requirements....

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## E207 Software – continued...

### E207.2 WCAG Conformance

- EXCEPTIONS:
  1. Software that is AT and supports the accessibility services of the platform need not conform to E207.2
  2. Non-Web software need not conform to the following 4 SC:
    - 2.4.1. Bypass Blocks; 2.4.5 Multiple Ways; 3.2.3 Consistent Navigation; and 3.2.4 Consistent Identification
  3. Non-Web software need not conform to “Conformance Requirement 3 Complete Processes” in WCAG 2.0

### E207.3 Complete Processes for Non-Web software

- Where Non-Web software requires multiple steps to accomplish an activity, all the Non-Web software shall conform to WCAG 2.0

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## Chapter 5 Software

### 501 General

- 501.1 Scope – apply to software where required by Chapter 2 Scoping (E207) and where otherwise referenced in Revised 508 Standards
- EXCEPTION: Where web applications do not have access to platform accessibility services and do not include components that have access to platform accessibility services, they need not conform to 502 or 503, PROVIDED they conform to WCAG 2.0 Level A and AA SC

### 502 Interoperability with Assistive Technology

### 503 Applications

### 504 Authoring Tools

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## WCAG 2.0 Web Content Accessibility Guidelines (2008)

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# WCAG 2.0 Standard

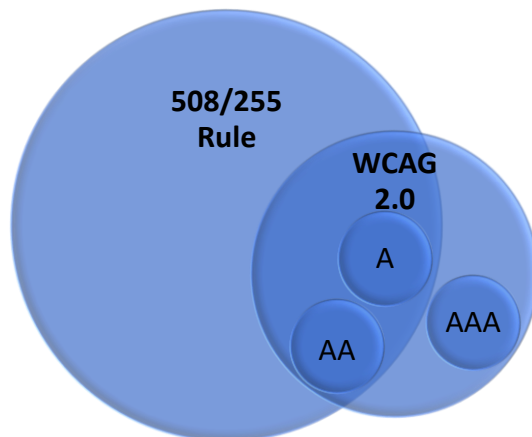
“Web Content Accessibility Guidelines”

- Organization:
  1. General principles
  2. Guidelines
  3. Success Criteria (three levels: A, AA, AAA)
- <http://w3.org/tr/wcag>

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# WCAG 2.0 Incorporation By Reference



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## WCAG 2.0 “incorporated by reference” into Revised 508 Standards and Broadly Applied

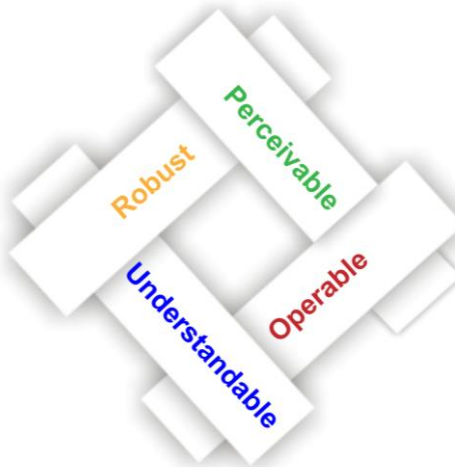
- Apply to web pages, software, documents
- Must follow all Level A and AA Success Criteria and Conformance Requirements
- International standard for accessible web pages
  - European Standard, Mandate 376, EN 301 549
- Wealth of Guidance Materials
  - <http://w3.org/wai>

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## WCAG 2.0 Principles: POUR

- All SC fall under these four Principles
- POUR
  1. Perceivable
  2. Operable
  3. Understandable
  4. Robust
- WCAG organization:
  - Principles
  - Guidelines
  - Success Criteria



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## WCAG 2.0 Guidelines

- 1.1 Provide text alternatives for any non-text content so that it can be changed into other forms people need, such as large print, braille, speech, symbols or simpler language.
- 1.2 Provide alternatives for time-based media.
- 1.3 Create content that can be presented in different ways (for example simpler layout) without losing information or structure.
- 1.4 Make it easier for users to see and hear content including separating foreground from background.
- 2.1 Make all functionality available from a keyboard.
- 2.2 Provide users enough time to read and use content.
- 2.3 Do not design content in a way that is known to cause seizures.
- 2.4 Provide ways to help users navigate, find content, and determine where they are.
- 3.1 Make text content readable and understandable.
- 3.2 Make Web pages appear and operate in predictable ways.
- 3.3 Help users avoid and correct mistakes.
- 4.1 Maximize compatibility with current and future user agents, including assistive technologies.

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## E205.4: 38 WCAG 2 Level A & AA SC and Conformance Requirements

| Principle / Level | Perceivable   | Operable  | Understandable   | Robust   |
|-------------------|---|---|--|--|
| <b>Level A</b>    | <ul style="list-style-type: none"> <li>1.1.1 Non-text Content</li> <li>1.2.1 Audio-only and Video-only (Pre.)</li> <li>1.2.2 Captions (Pre.)</li> <li>1.2.3 Audio Description or Media Alternative (Pre.)</li> <li>1.3.1 Info and Relationships</li> <li>1.3.2 Meaningful Sequence</li> <li>1.3.3 Sensory Characteristics</li> <li>1.4.1 Use of Color</li> <li>1.4.2 Audio Control</li> </ul> | <ul style="list-style-type: none"> <li>2.1.1 Keyboard</li> <li>2.1.2 No Keyboard Trap</li> <li>2.2.1 Timing Adjustable</li> <li>2.2.2 Pause, Stop, Hide</li> <li>2.3.1 Three Flashes or Below Threshold</li> <li>2.4.1 Bypass Blocks</li> <li>2.4.2 Page Titled</li> <li>2.4.3 Focus Order</li> <li>2.4.4 Link Purpose (In Context)</li> <li>2.4.5 Multiple Ways</li> <li>2.4.6 Headings and Labels</li> <li>2.4.7 Focus Visible</li> </ul> | <ul style="list-style-type: none"> <li>3.1.1 Language of Page</li> <li>3.2.1 On Focus</li> <li>3.2.2 On Input</li> <li>3.3.1 Error Identification</li> <li>3.3.2 Labels or Instructions</li> </ul>   | <ul style="list-style-type: none"> <li>4.1.1 Parsing</li> <li>4.1.2 Name, Role, Value</li> </ul> |
| <b>Level AA</b>   | <ul style="list-style-type: none"> <li>1.2.4 Captions (Live)</li> <li>1.2.5 Audio Description (Pre.)</li> <li>1.4.3 Contrast (Minimum)</li> <li>1.4.4 Resize text</li> <li>1.4.5 Images of Text</li> </ul>  |   | <ul style="list-style-type: none"> <li>3.1.2 Language of Parts</li> <li>3.2.3 Consistent Navigation</li> <li>3.2.4 Consistent Identification</li> <li>3.3.3 Error Suggestion</li> <li>3.3.4 Error Prevention (Legal, Financial, Data)</li> </ul> | <p><i>(Note: There are NO Robust SCs at Level AA)</i></p>  |

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## II. Accessible Websites

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### Chapter 5 Software vs. Web Content

- Q: For web content, when do I use Chapter 5?
- Q: Is WCAG 2.0 Level AA all I need to worry about?
  - What about WCAG 2.1 and 2.2?
- Q: What is the meaning of Exception 501.1 under 501 General?

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## Chapter 5 Software -- 501.1 Scope

- Q: What is the meaning of Exception 501.1 under 501 General?
- EXCEPTION:
  - Where Web applications do not have access to platform accessibility services and do not include components that have access to platform accessibility services, they shall not be required to conform to 502 or 503 provided that they conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1).

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## Desktop Apps vs. Web Apps

- Q: Are products like MS Office Online required to meet web or software accessibility standards?
- A: For web applications (online), WCAG 2.0 is sufficient.
  - For software (desktop app), look to Chapter 5.
- In general, distinction is still clear.
- Web pages do more and more with embedded apps.
  - Originally 508 Standard had requirement for applets and plug-ins, but technology has changed.
- MS, Adobe, others working to erase difference to user between web and mobile version.

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## 501.1 Scope Exception

- Where Web applications do not have access to platform accessibility services and do not include components that have access to platform accessibility services, they shall ***not be required to conform to 502 or 503*** provided that they conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1).
- Web applications not having access to ***system*** platform [accessibility] services ***is common***.
  - 502 Interoperability with Assistive Technology
  - 503 Applications
    - Media players most likely have access to platform accessibility services
- 504 Authoring Tools ***might*** apply

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## 504 Authoring Tools

- 504.2 Content Creation or Editing (excerpt)
  - Authoring tools shall provide a mode of operation to create or edit content that conforms to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 for all supported features and, as applicable, to file formats supported by the authoring tool.
- 504.3 Prompts
- 505.4 Templates

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## When does PDF/UA apply?

- 504.2.2 PDF Export
- Authoring tools capable of exporting PDF files that conform to ISO 32000-1:2008 (PDF 1.7) shall also be capable of exporting PDF files that conform to ANSI/AIIM/ISO 14289-1:2016 (PDF/UA-1) (incorporated by reference, see 702.3.1).
- Paraphrase: *If* your authoring tool can export modern PDFs, it *also* needs to be able to export PDFs that conform to PDF/UA.
  - Note: PDF/UA is a subset of PDF 1.7

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## Going Beyond the Minimum

- Q: Is WCAG 2.0 Level AA all I need to worry about?
- A: For 508 conformant web content, yes.
  - However, for enhanced accessibility, Level AAA has some other criteria you might consider
- Q: What about WCAG 2.1 and 2.2?
- A: For 508 conformant web content, WCAG 2.0 is enough.
  - However, for enhanced accessibility, WCAG 2.1 and 2.2 have some other criteria you might consider
  - WCAG 2.1 and 2.2 are “backwards compatible”

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## Two Examples WCAG 2.1 SC

- 2.1.4 Character Key Shortcuts (A)
  - If a keyboard shortcut is implemented in content using only letter (including upper- and lower-case letters), punctuation, number, or symbol characters, then at least one of the following is true...
- 4.11 Non-Text Contrast (AA)
  - The visual presentation of the following have a contrast ratio of at least 3:1 against adjacent color(s):
    - User Interface Components...
    - Graphical Objects...
- [www.w3.org/tr/wcag21](http://www.w3.org/tr/wcag21)

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## 508 and Graphical Apps

- Q: Does 508 require applications like Photoshop Online to be accessible?
- A: Yes!
  - Photoshop (and the like) are software, software is IT, and software is covered by Revised 508 Standards
    - + In general, software needs to conform to WCAG 2.0 Level AA
    - + See E207.2 WCAG Conformance for the exact phrasing

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## WCAG and Graphical Apps

- Q: How can graphically intensive web apps conform to WCAG?
  - Maps (GIS)
  - Web cams
  - Drawing and painting apps
- A: Many WCAG 2.0 Success Criteria have important caveats.
  - “Accessible” generally means “conforming with accessibility standards”
  - Conforming with accessibility standards does not guarantee that graphical apps are meaningfully useful to someone who cannot see.

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## SC 1.1.1 and Graphical Apps

- 1.1.1 Non-text Content (excerpts, emphasis added):
  - All non-text content that is presented to the user has a **text alternative that serves the equivalent purpose**, except for the situations listed below. (Level A)
  - Sensory:
    - 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.
- Art and photographs are examples of providing sensory experiences.

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## SC 2.1.1 and Graphical Apps

- 2.1.1 Keyboard (emphasis added):
  - All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes, ***except where the underlying function requires input that depends on the path of the user's movement and not just the endpoints.*** (Level A)
- Painting is an example of input that depends on a user's movement.

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## What automated tools can we use to test web apps?

- Is automated testing enough?
- Examples – not endorsed by USAB
- University of Illinois Functional Accessibility Evaluator (FAE)
  - <http://fae.disability.illinois.edu>
- WebAIM WAVE Web Accessibility Evaluation Tool
  - <http://wave.webaim.org>
- SSA Accessible Name and Description Inspector
  - [www.ssa.gov/accessibility/andi](http://www.ssa.gov/accessibility/andi)
- Automated tools only catch ~30% of errors!

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## Is software covered by E205.3 Agency Official Communication (AOC)?

- E205.3 Agency Official Communication
  - Electronic content that is not public facing shall conform to the accessibility requirements specified in E205.4 when such content constitutes official business and is communicated by an agency through one or more of the following...
- Q: Does this apply to software?
- A: No, 508 always applies to software

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## III. Synchronized Media

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## Synchronized Media

- Is it Public or Agency Official Communication (E205)?
  - ✓ No – 508 does not apply.
  - Yes – continue.
- Sync Media Requirements
  - Prerecorded:
    - 1.2.2 Captions (Prerecorded)
    - 1.2.5 Audio Description (Prerecorded)
  - Live:
    - 1.2.4 Captions (Live)
- Audio-only and video-only Requirement: transcript

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## Captions

- **Synchronized** text alternative for both speech and non-speech audio information needed to understand the media content
  - Include spoken dialogue and equivalents for meaningful sounds: noises, music, laughter;
  - Identify speaker and location to aid in understanding.
- Closed Captions are equivalents that can be turned on and off with some players.
- Open Captions are any captions that cannot be turned off.
- Captions should not obscure or obstruct relevant information in the video.

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## Audio Descriptions

- Access for people who are blind or have low vision
- Describe aloud the visual elements of the video as part of the audio track.
  - Information about actions, characters, scene changes, and on-screen text that are important when they appear that are not described in the main soundtrack.
- Section 508/WCAG 1.2.5 (AA): AD inserted during existing pauses in dialogue

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## Social Media



- Ensure the *accessible* content is available on your .gov site
- Know the limitations of the social media platform
  - Does its media player support captions?
  - Does its media player support audio descriptions?
    - Provide a link to the accessible version(s)
  - Does it support alternative text descriptions for images?
    - Add the image description in the text of the post

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## IV. Video Conferencing

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### Remote Video Conferencing

- Video conferencing applications/systems are ICT
  - *Software*
  - *Web*
  - *Hardware*
- “Where ICT displays video with synchronized audio”:
  - *SW/Web*: 503.4 requires user controls for captions and audio descriptions
  - *Hardware*:
    - Processing: 413 CC, 414 AD
    - Controls: 415 CC and AD controls

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## Does 508 apply to live virtual meetings?

1. Is it Public or Agency Official Communication (E205)?
  - ✓ No – 508 does not apply.
  - Yes – continue.

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## 2. Is it a live meeting held virtually?



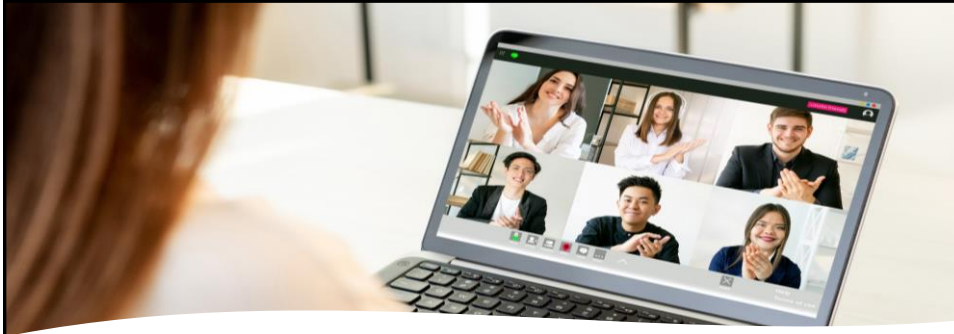
- No – continue evaluation.
- Yes, Section 508 does not apply.

*\*\*Other accessibility laws (Section 504) may require accommodations.*

“Live meeting” is defined as “two-way multimedia calls between two or more individuals through web apps” in [www.w3.org/WAI/WCAG21/Understanding/captions-live.html](http://www.w3.org/WAI/WCAG21/Understanding/captions-live.html)

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### 3. Is it a live (real-time) presentation?

✓ **Yes, 508 applies:**

- **Captions are required.** (WCAG SC 1.2.4 Captions (Live): Captions are provided for all live audio content in synchronized media).
- AD is not required.
- ALL live sync'd media broadcasts regardless of how it is shared (remote meeting application, website, etc.)
- No – continue evaluation.

**\*\*Other accessibility laws (e.g., Section 504) may require accommodations.**

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## More content questions...

### 4. Is pre-recorded synchronized media being shared?

- No – continue evaluation.
- **Yes, Captions and Audio Descriptions are required.**
  - 1.2.2 Captions (Pre-recorded)
  - 1.2.5 Audio Description (Prerecorded)
- All pre-recorded sync'd media regardless of how it is shared (remote meeting application, website, etc.)

### 5. Are any other electronic content files being shared?

- **Yes, E205.4 requires WCAG 2.0 Level A and Level AA.**
  - EXCEPTION: Non-Web documents shall not be required to conform to the following four WCAG 2.0 Success Criteria: 2.4.1 Bypass Blocks, 2.4.5 Multiple Ways, 3.2.3 Consistent Navigation, and 3.2.4 Consistent Identification.

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## Q: What about content from public contributors on Gov platforms?

- Government host is responsible for accessibility of meeting content.
- Plan:
  - Have content submitted in advance of the meeting for accessibility review.
    - If it can be made accessible prior to the meeting, do so.
    - If not, do not share.
  - If sharing inaccessible content is necessary, plan to accommodate meeting attendees.
- Post-meeting: If the content will be made available on .gov site, then the content must be made conformant.

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## Automated Accessibility Checkers

- Automated capabilities vary in applications
  - Images without descriptions
  - Reading order prompts
  - Color contrast (maybe)
- Available in Adobe Acrobat, Microsoft Office
- Automated checkers cannot catch all issues. Perform additional manual checks.
- [Section508.gov/test/documents](https://www.section508.gov/test/documents)

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## Q: Are there free tools that can help caption videos?

- YouTube Auto Captions
  - Auto captions generated for accounts with >1,000 subs.
  - Edit in YouTube Studio
- YouTube Studio
  - Upload your video (does not need to be public facing)
  - Upload your full transcript/auto captions
    - Can also create text in the app
  - Download caption file feature (multiple file formats supported)
- Edit text and timings for accuracy
  - Identify speakers, meaningful sounds
  - Upload corrected captions file for all applicable videos
  - CC will be added on video thumbnail

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## Q: How can audio descriptions be added?

1. One version for all: integrate AD
  - PLAN so secondary descriptions aren't needed.
  - Include descriptions in dialog in primary audio track
  - Speakers provide all necessary descriptions
  - No additional technology needed
2. Create a separate AD track/separate video.
  - PLAN for adequate gaps in the scripted audio to add descriptions later
  - Add AD in separate audio file and add track during post production.
  - DIY: YouDescribe for YouTube videos. (<https://youdescribe.org/>)
    - Link to the video on YouDescribe
3. Third party plugin (not free) to add AD for a media player.

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## Section508.gov

- Create Accessible Synchronized Media Content
  - [section508.gov/create/synchronized-media](https://www.section508.gov/create/synchronized-media)
- Virtual Meetings and Collaboration tips and Create Accessible Video, Audio and Social Media
  - [section508.gov/create/video-social](https://www.section508.gov/create/video-social)

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## V. Questions and Answers



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## VI. Resources and Contact Information

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## Resources - Standards

### Revised 508 Standards(2017):

- [www.access-board.gov](http://www.access-board.gov) -> Guidelines & Standards (top menu) -> ICT (§508 and §255)
- [www.access-board.gov/ict](http://www.access-board.gov/ict)

### WCAG 2.0 SC and Conformance Requirements(2008):

- [www.w3.org/TR/WCAG20](http://www.w3.org/TR/WCAG20)
  - Understanding WCAG 2.0 (technical assistance)
  - Techniques for WCAG 2.0 (technical assistance)

### Video Introduction to Web Accessibility and W3C Standards:

- [www.w3.org/WAI/videos/standards-and-benefits/](http://www.w3.org/WAI/videos/standards-and-benefits/)

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## Resources – Creating, testing Accessible Documents

- WebAIM, Microsoft Word - Creating Accessible Documents  
<http://webaim.org/techniques/word>
- PDF Techniques for WCAG 2.0  
<http://www.w3.org/TR/WCAG20-TECHS/pdf.html>
- Web Accessibility Initiative:  
<https://www.w3.org/WAI>

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## Section508.gov/create

### Create Accessible Digital Products

Federal agencies are responsible for ensuring their information and services are accessible to persons with disabilities. The [Revised 508 Standards](#) include not just IT tools and systems, but electronic content such as documents, web pages, presentations, social media content, blogs, and certain emails.



[Documents](#)



[Electronic Signatures](#)



[PDFs](#)



[Presentations](#)



[Software & Websites](#)



[Spreadsheets](#)



[Universal Design](#)



[Synchronized Media  
\(Multimedia\)](#)



[Video, Audio, Social](#)

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For More Information,  
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Thank you for participating in today's  
webinar



Next session: March 30, 2021

Review of the Revised 508 Standards (Part II):  
Requirements for Hardware and Software

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