January 24, 2013

MEMORANDUM FOR THE CHIEF ACQUISITION OFFICERS
                              SENIOR PROCUREMENT EXECUTIVES
                              CHIEF INFORMATION OFFICERS
                              SMALL AGENCY COUNCIL MEMBERS

FROM: Joseph G. Jordan
                             Administrator for Federal Procurement Policy

                             Steven VanRoekel
                             Chief Information Officer

SUBJECT: Strategic Plan for Improving Management of Section 508
                             of the Rehabilitation Act

        The Administration is committed to increasing transparency and improving access to government information and data for all people. This increased transparency requires that information be made available to the public in formats that provide equal access to persons with disabilities. Essential to meeting this objective is ensuring that all electronic and information technology (EIT) that is developed, procured, maintained, or used by the Federal Government is accessible, as required by Section 508 of the Rehabilitation Act of 1973.[1] Many Federal agencies' guidance and plans, such as the 2012 Digital Government strategy,[2] include EIT accessibility as a strategic outcome. However, implementation of Section 508 across agencies is not consistent, and a more comprehensive approach is needed to build and sustain an accessible Federal technology environment.

        The attached strategic plan, which was developed based on extensive community feedback and stakeholder input, provides a more comprehensive and structured approach to further improve agencies' management of the requirements of Section 508. This approach includes actions agencies need to take to (1) increase transparency, (2) strengthen accountability, and (3) improve collaboration regarding accessible EIT. Specifically, the actions in the plan provide a consistent foundation for agencies to use in building, maturing, and sustaining a successful accessibility program that will support:

> o Creating a diverse environment where individuals of all abilities can work, interact, and develop into leaders;
> o Fully integrating accessibility considerations into the processes used in developing, procuring, maintaining, and using EIT, and;

---

[1] 29 U.S.C. §794d

[2] *Digital Government: Building a 21st Century Platform to Better Serve the American People*, May 23, 2012 at http://www.whitehouse.gov/sites/default/files/omb/egov/digital-government/digital-government-strategy.pdf.

- o Building workforce skills to support an environment where Section 508 accessibility requirements are understood, communicated, implemented, and enforced.

Acquiring and managing accessible EIT must be an integral part of the acquisition and information technology lifecycles and needs to be a management priority if we are to continue to fulfill our promise of an open and transparent government. The information and guidance provided in the strategic plan will help agencies create the framework to make these necessary improvements to their EIT accessibility programs and increase transparency. Refinements and updates to the roles and responsibilities - as well as ongoing efforts to share best practices - will allow for flexibility and changes as agencies continue to make improvements.

Please contact Karen Pica in the Office of Federal Procurement Policy or Tim McCrosson in the Office of E-government and Information Technology at section508@omb.eop.gov. Thank you for your attention to this matter.

Attachments

Strategic Plan: Improving Management of Section 508
of the Rehabilitation Act

*A Framework for Enhancing and Sustaining Management Improvements
to Increase the Accessibility of Electronic and Information Technology*

2013

Table of Contents

Introduction

An effective and responsive government depends on citizen engagement as well as a diverse, well-prepared workforce; both of these require access to information and technology. An essential component of such access is ensuring that the electronic and information technology (EIT) developed, procured, maintained, or used within the Federal Government is accessible to all Federal employees and members of the public as required by Section 508 of the Rehabilitation Act of 1973, codified at 29 U.S.C. §794d, as amended (Section 508). Developing, procuring, and maintaining accessible EIT is the responsibility of all Federal employees. Federal employees engaged in defining requirements, acquiring and managing goods and services, and developing information or documents for sharing have additional responsibilities and are the focus of the plan outlined here. Close collaboration among these employees and across the acquisition and information technology lifecycles is essential in ensuring Section 508 requirements are considered and result in tools and technology that support a diverse Federal workforce.

The results of the most recent Department of Justice (DOJ) Section 508 compliance survey,[3] the various listening sessions held by the Federal Chief Information Officers (CIO) Council during fiscal year (FY) 2011,[4] and the national dialogue on accessibility sponsored by the CIO Council in 2012[5] confirm that disparities exist in the implementation and management of the program across Federal agencies. Stakeholders indicate agency Section 508 programs vary widely in maturity, with the primary challenges focused in three areas: understanding and applying standards; defining and measuring program success; and developing the workforce. To begin to address these concerns, previous guidance from the Office of Management and Budget (OMB)[6] outlined steps to (1) increase awareness of responsibilities and requirements, (2) improve agency accountability and performance, and (3) improve outreach and communication. Additionally, the Chief Acquisition Officers Council (CAOC) and the Chief Information Officers Council (CIOC) are co-chairing the CIOC Accessibility Committee that focuses on accessibility performance across Federal agencies.

These efforts have met with some success, particularly in identifying and sharing best practices; however, more is needed to develop a comprehensive approach. Continued improvements in the accessibility of government EIT require a consistent approach to identify and measure success. This strategic plan focuses on the management practices necessary to create this consistent approach and build and sustain an accessible Federal technology environment. To do so, this management plan focuses on those Federal employees with responsibilities along the acquisition and information technology lifecycles and addresses management objectives and actions associated with (1) increasing transparency, (2) strengthening accountability, and (3) improving collaboration for the consistent management of Section 508.

---

[3] www.ada.gov/508
[4] https://cio.gov/about/committees/accessibility-committee/listening-sessions/
[5] www.section508.ideascale.com/
[6] Memorandum of July 19, 2010, *Improving the Accessibility of Government Information* www.whitehouse.gov/sites/default/files/omb/assets/procurement_memo/improving_accessibility_gov_info_071920 10.pdf

The Case for Accessible EIT

Meet Rose Ann Ashby – US Department of Education – Branch Chief in the Rehabilitation Services Administration – an agency within the Department primarily responsible for funding and overseeing the vocational rehabilitation program. Ms. Ashby joined the Federal Government in 1987: "I am blind and use a computer equipped with a screen reader with speech output to enable me to review and edit the work of my staff. I have had access to accessible computer technology since 1990 when our agency first began equipping professional staff with personal computers. Prior to my having a personal computer adapted with speech, I had to do all of my writing by typing documents on an electric typewriter or dictating my work to a reader; this was a burdensome process. With the advent of accessible computer technology, I now find that I am as efficient and productive as any employee with sight, and I am considered a high performing staff member of the agency. I am responsible for supervising a 15-member branch, the largest branch in the Rehabilitation Services Administration."

Millions of Americans of all ages identify as having disabilities. Approximately 8 million have vision difficulty and 8 million have hearing difficulty. The number of individuals with disabilities is expected to increase as the population ages. Section 508 of the Rehabilitation Act requires Federal agencies to ensure that all EIT developed, procured, maintained, or used in the Federal environment provides equal access for Federal employees and members of the public. The 2012 DOJ report identifies continued challenges with Section 508 implementation and management and makes recommendations for training, policy, and better collaboration.

Additionally, on May 23, 2012, the White House released the strategy on *Digital Government: Building a 21st Century Platform to Better Serve the American People*[7] and included EIT accessibility among the strategic outcomes. Focus on access to information and data through the use of technology is accomplished, in part, through continuous consideration of accessibility during the IT and acquisition lifecycles.[8]

Federal agencies are increasingly leveraging EIT in day-to-day operations. The responsibilities associated with implementation of Section 508 are shared across Federal agencies and by a cross-section of employees. This broad focus and need for collaboration is reflected in the leadership and composition of the CIOC Accessibility Committee. The committee is co-chaired by leaders from both the CIOC and the CAOC.

The Accessibility Committee has focused on identifying best practices as well as addressing challenges with Section 508 implementation and management. Members of the Accessibility Committee and other key stakeholders met during FYs 2011 and 2012 to identify key outcomes for successful Section 508 implementation across the Federal Government which includes properly:

---

[7] May 23, 2012 strategy on Digital Government www.whitehouse.gov/sites/default/files/omb/egov/digital-government/digital-government-strategy.pdf

[8] The acquisition lifecycle includes planning for needs, contracting for products and services, monitoring contract performance, and disposal. The Federal Acquisition Regulation contains Section 508 considerations in FAR Part 7 (acquisition planning), Part 11 (describing agency needs), and Part 39 (acquisition of information technology).

1. Creating a diverse environment where individuals of all abilities can work, interact, and develop into leaders;
2. Integrating accessibility considerations into the processes used in developing, procuring, maintaining, or using EIT, and;
3. Building workforce skills to support an environment where Section 508 requirements and responsibilities are well understood, communicated, implemented, and enforced.

This strategic plan is built around the critical management components and actions agencies need to take to increase transparency, strengthen accountability, and improve collaboration regarding accessible EIT. Focusing on these management aspects provides a consistent foundation for agencies to use in building, maturing, and sustaining a successful Section 508 program.

Increase Transparency

Transparency of Federal programs, performance, and spending facilitates increases in accountability and citizen engagement. To support increased transparency, the Accessibility Committee has expanded on information available to agencies by creating a best practices library. The library may be found at https://cio.gov/2011/05/ and contains examples of best practices in policy and procedures that can increase transparency. Feedback from the listening sessions and the national dialogue indicates several areas that would benefit from more transparency. Specific areas include opportunities for public engagement, inter-agency collaboration, and standardizing agency approaches to Section 508 implementation.

Transparency of agency Section 508 practices and application will be improved through two key actions: (1) providing the public with a standard feedback mechanism and statement available on agency websites, and (2) making www.section508.gov the one-stop information resource for agencies with respect to successful Section 508 management and implementation. Specifically, within 180 days of the release of this strategic plan:

1) the General Services Administration (GSA) will share with OMB the action plan for transforming www.section508.gov into the one-stop source of information and communication for successfully managing Section 508 implementation throughout the acquisition lifecycle.

2) Federal agencies will include an accessibility statement on all inter- and intranet websites. Secondary sites can link to the accessibility statement on the domain website. The accessibility statement should, at a minimum, include contact information for the agency Section 508 program, date of the last update, and the ability for website visitors to provide comments and/or feedback regarding the agency Section 508 program. Sample and best-in-practice accessibility statements can be found at www.section508.gov.

Strengthen Accountability

Developing and maintaining a successful Section 508 program requires clearly defined roles and responsibilities, standard processes and practices, and regular assessments. The DOJ report and feedback gathered during development of this plan suggest a need for clear identification of an

agency leader for Section 508, clarifying roles and responsibilities associated with Section 508 management, and developing measures against which agencies can assess progress. To address these areas, agencies will take the actions below to define and measure progress and to align agency activities with roles and responsibilities. Roles and responsibilities are provided in Appendix A and an updated version of this Appendix will be maintained at www.section508.gov. Agencies will also find additional information on best practices associated with these roles and responsibilities at that website. To further strengthen accountability:

1) Within 60 days of release of this management plan, each Federal agency Chief Information Officer (CIO) shall provide to GSA, via the section.508@gsa.gov mailbox, the name and contact information for the agency Section 508 coordinator. If the designated 508 coordinator changes, the agency CIO will notify GSA within 90 days. GSA will share this information through the www.section508.gov portal.[9] Information to consider when selecting the individual to serve as the Section 508 coordinator can be found at the same location and general roles and responsibilities can be found in Appendix A.

2) By March 1, 2013, the CIOC Accessibility Committee will develop a standard government-wide template for agencies to use in reporting baseline compliance of key measures. The template will be developed using measures selected from https://cio.gov/performance-metrics-and-measures/ areas below:
   a. The assessment for agency websites will include select key measures from the Quarterly Compliance Activity Report at https://cio.gov/performance-metrics-and-measures/#compliance.
   b. The procurement assessment will consider, at a minimum, the items included in the Section 508 Requirements in Procurement https://cio.gov/performance-metrics-and-measures/#process.

3) Within 120 days of the CIOC Accessibility Committee's completion of the template, agency CIOs, in collaboration with agency CAOs, will develop a plan for completing an agency baseline assessment of the Section 508 program. This plan will include either a full baseline or a sampling method that represents high-risk or key areas as identified by the agency. Agency CIOs will share their plans with the CIOC Accessibility Committee to help identify common areas for which collaboration would facilitate completion.

4) By December 30, 2013, agencies will complete their planned assessment using the CIOC standard template and share the information with the CIOC Accessibility Committee. The CIOC Accessibility Committee and GSA will use the information in the assessments for interagency analysis, trending, and planning to improve collaboration across agencies, reduce redundancies, and develop solutions and recommendations for improving Section 508 management across the Federal government.

---

[9]Review roles and responsibilities on GSA website. Contact information for current Section 508 coordinators and alternates are located at http://section508.gov/index.cfm?fuseAction=coordlistfullsite.

5) Beginning in the 3rd quarter of FY 2014, agencies will share progress in improving baseline assessment measures with OMB.

Improve Collaboration

Collaboration within, and among, Federal agencies fosters the use of best practices; provides models for success; contributes to reducing agency costs; and saves taxpayer dollars. Providing the Federal workforce with tools, job aids, training, and communities of practice will facilitate continuous learning and improve collaboration. This plan focuses on development efforts for Section 508 programs, coordinators, and Federal employees with responsibilities throughout the acquisition lifecycle. In an effort to further improve collaboration:

1) By June 2013, GSA will refresh the information and the format of the Reference Manual for Section 508 Coordinators to create a job aid for continuous learning and reference for agency EIT accessibility program managers, Section 508 Coordinators, and other relevant personnel.

2) By June 2013, GSA will share with the CAOC and CIOC recommendations and plans for making the Buy Accessible Wizard (www.buyaccessible.gov) easier to use, current with Access Board standards, and for increasing awareness of this tool among the Federal workforce, particularly those involved in identifying agency and program needs that will be met through procurement of EIT.

3) By the start of FY 2014, GSA will deliver refreshed Section 508 learning modules for the acquisition workforce and requiring officials.

4) As the 508 standards are updated, GSA and the Access Board will co-lead collaboration efforts focused on the appropriate mechanisms for sharing updates to the Section 508 standards with Section 508 coordinators and members of the acquisition workforce and those generating requirements.

Conclusion

Federal agencies are increasingly reliant on electronic and information technology in day-to-day operations and in providing services to citizens. The changing pace of technology and variations in agency management of Section 508 create challenges in providing Federal employees and citizens with consistent experiences across the Federal Government. A comprehensive approach to managing Section 508 along the full IT and acquisition lifecycles of an investment requires a long-term, consistent approach. The steps identified in this strategic plan and summarized in Appendix B are the first steps to improving management of Section 508. Additional references and resources that may aid agencies can be found in Appendix C and future steps for this plan will mature these processes to incorporate additional lessons learned and successes.

Appendix A – Roles and Responsibilities (most updated version to be maintained at www.section508.gov)

This table lists the acquisition and information technology roles and responsibilities for implementing and managing an agency Section 508 program for EIT.

	Roles and Responsibilities Related to Section 508
Access Board	• Promote accessibility for individuals with disabilities by developing accessibility standards for electronic and information technology (EIT). • Periodically review and amend standards to reflect changes and advances in technology. • In collaboration with GSA, provide technical assistance concerning the implementation of the Section 508 standards.
Agency Chief Acquisition Officer (CAO)	• Responsible for agency performance of acquisition activities and acquisition programs, to include development of the agency's acquisition workforce. • In collaboration with the Chief Information Officer (CIO), ensure Section 508 requirements are incorporated into any EIT that is procured by the agency.
Agency Chief Information Officer (CIO)	• Establish the agency Section 508 program, provide leadership of the program, and appoint the agency Section 508 coordinator/manager. • Ensure Section 508 accessibility considerations are incorporated into the planning, operation, and management of any EIT that is developed, used, or maintained by the agency. • In collaboration with agency CAO, ensure Section 508 is considered in EIT procured by the agency.
Agency Senior Procurement Executive	• Responsible for management direction of the acquisition systems of an executive branch agency, including the implementation of the unique acquisition policies, regulations, and standards of the agency.
CIO Council Accessibility Committee	• Serve as the principal interagency forum to improve the implementation of Section 508. • Additional responsibilities may be found at https://cio.gov/about/committees/accessibility-committee/
Department of Justice	• Biennially, conduct a survey of all Federal Agencies to ascertain status of compliance with Section 508. • Prepare and submit to the President and Congress a report on and recommendations regarding the state of Federal agency compliance with Section 508.
Federal Acquisition Regulatory (FAR) Council	• Incorporate Access Board standards into the (FAR) as appropriate.
General Services Administration (GSA)	• In collaboration with the Access Board, provide Section 508 technical assistance, tools, and workforce development support to Federal agencies. • Lead development and management of tools, such as the Section 508 portal and the BuyAccessible Wizard, for use by the acquisition, requiring, IT, and Section 508 coordinator communities.
Heads of Federal Agencies	• Ensure that individuals involved in acquisition planning and requirements generation specify needs; develop plans, specifications, etc. that address EIT accessibility using standards issued in 36 CFR part 1194.
Agency Section 508 Coordinator	• Manage an agency Section 508 program on behalf of the agency CIO, to include developing and maintaining agency policies, guidebooks, and disseminating best practices.

	• Provide consultation to, or participate in, agency capital planning and/or business case development and IT governance to ensure EIT appropriately considers Section 508 across the IT and acquisition lifecycles. • Partner with other Section 508 Coordinators throughout the Federal Government to assist in meeting Section 508 goals and objectives. • Consider additional detailed responsibilities as provided for in the GSA Resource Manual for Section 508 coordinators which will be located and maintained on www.section508.gov.
Contracting Officer	• Review and comply with the of FAR 11.002(f) and 39.2 by ensuring Section 508 standards are considered in acquisition planning documents and procurement requirements for EIT and that deliverables meet accessibility standards. • Include appropriate Section508 accessibility standards in requirements and acquisition planning documents and agreements.
Contracting Officer's Representative and Requiring Officials	• Include appropriate Section 508 accessibility standards in acquisition planning and requirement documents. • Verify that products or services delivered under an agreement meet the accessibility terms and conditions included in a contract prior to accepting deliverables.
Information Technology Program and Project Managers	• Consistent with the Federal Acquisition Certification for Program and Project Managers, and the OPM Competency Model for IT Program Management,[10] ensure Section 508 is considered throughout the acquisition and information technology lifecycles.
Purchase Card Holders	• Confirm the accessibility of products or services prior to purchase.

---

[10] http://www.chcoc.gov/transmittals/TransmittalDetails.aspx?TransmittalID=4058

Appendix B – Action Plan

Improving Management of Section 508 - Action Plan

Focus Area	Activity	Owner	Timeframe
Increase Transparency	Action plan for transforming www.section508.gov into a one-stop source of information and communication.	GSA	Within 180 days of release of plan
Increase Transparency	Include an accessibility statement on agency inter- and intranet sites.	Federal agencies	Within 180 days of release of plan
Strengthen Accountability	Appoint a Section 508 coordinator and share information with GSA.	CIO	Within 60 days of release of plan
Strengthen Accountability	Develop a standard template for agencies to use in reporting baseline measures and progress against those measures.	CIOC Accessibility Committee	March 1, 2013
Strengthen Accountability	Develop a plan and schedule for completing a baseline assessment for Section 508 with respect to websites and procurement.	CIO and CAO	Within 120 days of completion of the template
Strengthen Accountability	Complete baseline assessment and report outcomes in the standard template to the Agency CIO and CIOC Accessibility Committee.	CIO and CAO	December 2013
Strengthen Accountability	Provide updates on progress related to the baseline measures in status meetings with the Office of Management and Budget.	CIO and CAO	3rd Quarter FY2014
Improve Collaboration	Refresh reference manual for Section 508 coordinators.	GSA	June 2013
Improve Collaboration	Refresh Section 508 learning modules for the acquisition workforce.	GSA	October 2013
Improve Collaboration	Identify appropriate mechanisms for sharing updates on Section 508 standards.	GSA	When standards are updated
Improve Collaboration	Identify recommendations for making BuyAccessible Wizard easier to use	GSA and Accessibility Committee	June 2013
Improve Collaboration	Identify recommendations for increasing awareness of BuyAccessible Wizard tool among applicable Federal workforce.	GSA and Accessibility Committee	June 2013

Appendix C – Resources and Additional Guidance

<u>Resources</u>

Section 508 Standards – United States Access Board - www.access-board.gov/508.htm

BuyAccessible Wizard – www.buyaccessible.gov – tool that helps program officials determine if the needed products or services are subject to Section 508, support market research, and provide tips and solicitation language that can be used in building requirements that will result in compliant outcomes.

Developing Accessible Software – United States Access Board www.access-board.gov/sec508/software-tutorial.htm

Section508.gov – www.section508.gov is the one-stop information resource on Section508 that include tools and tips for agency coordinators, information for members of the acquisition workforce, links to training, etc.

Chief Information Officers Council (CIOC) Accessibility Committee – https://cio.gov/2011/05/ information on best practices, measures, and other useful information as developed and shared by members.

Top Ten Things a CIO Should Know About Accessibility – https://cio.gov/top-ten-things-cios-should-know-about-accessibility/ as developed by the CIOC Accessibility Committee

Federal Acquisition Regulations - www.acquisition.gov/far/ - Contains Section 508 considerations in FAR Part 7 (acquisition planning), Part 11 (describing agency needs), and Part 39 (acquisition of information technology).

<u>Additional OMB Guidance:</u>

Improving the Accessibility of Government Information – July 19, 2010
www.whitehouse.gov/sites/default/files/omb/assets/procurement_memo/improving_accessibility_gov_info_07192010.pdf

Ensuring the Accessibility of Federal Electronic and Information Technologies Procured by Federal Agencies – November 6, 2007
www.whitehouse.gov/sites/default/files/omb/assets/procurement/electronic_info_technologies.pdf

Buying Accessible Electronic and Information Technology and Complying with Section 508 of the Rehabilitation Act – August 11, 2005
hwww.whitehouse.gov/sites/default/files/omb/assets/procurement/section508memo081105.pdf