Executive Guide to Federal IT Accessibility

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Introduction

The Federal government strives to deliver a level of service comparable to that of the best private sector organizations, and as more government services move online, we have a responsibility to ensure equal access to those services, particularly for the

1 in 4 US adults—61 million Americans—living with a disability. All information technology (IT) purchased, built, maintained or used by U.S. Federal agencies is required by Section 508 of the Rehabilitation Act of 1973 to be accessible.

Aside from the legal requirements, accessibility is good for business. Creating products and information that everyone can use drives innovation, provides a better customer experience, and improves employee engagement. Accessibility helps you reach more stakeholders and, ultimately, achieve your agency's mission.

Executive support for accessible IT is essential to increase compliance with Federal policy, and help agencies deliver a digital customer experience that is accessible to all. Drawn from successful practices in both government and the private sector, this guide aims to help Federal CIOs and senior executives improve the accessibility of our Federal IT, through advocacy, strong governance, and appropriate resourcing of accessibility business functions.



Benefits

Better accessibility supports many areas of information assurance, including security and privacy. Accessible websites are easier to maintain, inherently mobile-friendly, and retain customers by delivering a better customer experience. When we design IT systems to be accessible from the outset, we avoid having to make expensive retrofits to comply with policy, and reduce the risk of customer complaints and costly lawsuits. In addition, accessible and easy-to-use technology solutions can improve public perception of government.

- Benefits of Accessible Design include more customers, cost savings, and innovation
- More Benefits of Accessible Design from Deque



Management

Strong executive support for IT accessibility, and clear policies that drive action, will increase compliance and expand access to government services for citizens with disabilities.

• IT Accessibility: An Overview for Government Executives

Policy

Establish a policy that identifies how your agency will manage accessibility compliance, agency-wide.

- Incorporate Section 508 compliance activities into agency-wide policies and procedures, particularly in the areas of acquisition, software development, content management, cloud, human resources and civil rights complaints.
- Address accessibility throughout your agency's software development lifecycle, from acquisition, through development, configuration, deployment, and maintenance; include digital content creation and management.
- Define clear roles and responsibilities.
- Develop a roadmap to increase transparency, strengthen accountability, and improve collaboration around accessible technology at your agency.
- Review the <u>Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act</u> OMB (PDF, January 2013)

Sample Accessibility Statements and Website Policies

- Accessibility Help SSA
- Accessibility DHS
- Web Governance Accessibility VA
- Website accessibility USA.gov

Governance

Ensure systems are in place across your agency to monitor conformance to the Revised 508 Standards. These monitoring systems should follow the entire software development lifecycle, including enterprise architecture reviews, IT program reviews, acquisition, design, development, production release reviews, and change control.

- The IT Accessibility/508 Program Office will be most effective as part of the Agency Chief Information Officer (CIO) Team.
- The 508 Program Manager should report directly to the Agency CIO, Deputy CIO, or Agency CTO.

Staffing

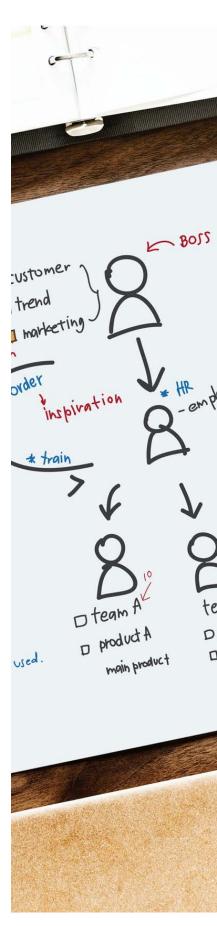
Stand up an agency-wide IT Accessibility/508 Program, and resource appropriately.

- Appoint an IT Accessibility/508 Program Manager (508 PM)
 - Delegate proper authority for your 508 PM to serve as the principal agency authority on Section 508 compliance matters, and to manage legal compliance risk on behalf of the agency.
- Adequately staff the accessibility function across your agency. Include staff with skills and expertise in:
 - o Project management;
 - o IT governance;
 - o IT acquisition;
 - Accessibility testing and validation;
 - Use of assistive technology;
 - o Compliance analysis;
 - o Training; and
 - o Communications.
- Encourage program offices to develop internal IT accessibility expertise, particularly when buying or building technology.
- If contract support is needed, ensure contractors are skilled at both assessing and supporting Section 508 compliance activities.
- Roles and Responsibilities

Training

Support efforts to train staff on their responsibilities under Section 508, to ensure your agency buys and builds accessible content and products.

- Support and encourage accessibility training for acquisition professionals, IT project managers, communications staff, web managers, software developers, authors of digital content, help desk support staff, and civil rights staff.
- Government-wide IT Accessibility Training
- IT Accessibility/508 Program Manager Playbook



OMB Reporting

Oversee submission of required reports on 508 program maturity and compliance to OMB twice per year (every February and August). These bi-annual reports are required for all CFO Act Agencies (as part of regular integrated data collection (IDC) reporting), and recommended for *all* Federal agencies.

- Guidelines for assessing program maturity
- Monitor and report progress to OMB

Collaboration

Collaborate within and across agencies to accurately baseline your IT Accessibility/508 program and leverage existing best practices and resources.

- Participate in the <u>Chief Information Officer Council Accessibility Community of Practice (ACOP)</u>.
 - Assign at least one agency representative to the ACOP (preferably a seniorlevel government manager).
 - Assign representatives to each of the ACOP's subcommittees, and contribute to the development of tools, training and best practices to help agencies improve accessibility.
- Use standardized testing methodologies such as the Trusted Tester Process, and participate in the <u>Interagency Trusted Tester Program</u>, to ensure conformance to the Revised 508 Standards.
- Conduct an accessibility review of all IT-related acquisitions, policies and directives.



Design and Development

Following the lead of innovative technology companies, adopt <u>universal design</u> as a core development principle. Universal design is a concept in which products and environments are designed to be usable by all people, to the greatest extent possible, without the need for adaption or specialized design.

- Ensure developers and designers understand their responsibilities under Section 508, and know how to incorporate accessibility as a core requirement for all IT projects.
- Encourage collaboration between developers, usability professionals, and requirements analysts.
- <u>Create accessible digital products</u> including software, websites and documents.



Testing

Ensure accessibility testing is incorporated into your agency's standard software development lifecycle.

- Support establishment of agency policies and processes to conduct accessibility testing throughout the standard software development lifecycle.
- Encourage collaboration between developers, requirements analysts, and procurement and usability professionals.
- Require developers to incorporate accessibility testing into project planning and software development and maintenance, and re-test software whenever it's modified.
- Ensure successful conformance to the Revised 508 Standards is a core requirement for any agency purchase that has a technology component.
- Test for accessibility



Procurement

Implement policies and practices to ensure accessibility is identified as a core requirement for all IT-related procurements at your agency.

- Collaborate with your agency's Contracting/Procurement Office to ensure all ITrelated solicitations identify and address Section 508 conformance requirements and acceptance criteria.
- Provide training to requirements officials so they can identify applicable accessibility requirements.
- Create a governance process to ensure Section 508 conformance is addressed in award decisions.
- Buy accessible IT products and services



Legal Considerations

The Law

Section 508 of the Rehabilitation Act (29 U.S.C. 794d), as amended in 1998, is a Federal law that requires equal access for individuals with disabilities to technology funded or provided by the Federal government. **This law applies to all IT the Federal government buys, builds, maintains, and uses.** Access should be comparable to that of individuals who do not have disabilities, unless an undue burden would be imposed on the agency.

Section 508 of the Rehabilitation Act

The Standards

The Information and Communication Technology (ICT) Final Standards and Guidelines (also known as the <u>Revised 508 Standards</u>) are the technical requirements and criteria used to measure conformance with Section 508. Non-compliance can result in time-consuming and costly lawsuits, delayed implementation of key IT investment priorities, and damage to public mission or image.

- The Revised 508 Standards
- Overview of the Rule
- IT Accessibility Laws and Policies

Conclusion

IT Accessibility is a team effort that requires strong support from agency leaders, and participation across the entire agency. With the right "coach," Federal agencies can build a culture that values the importance of equal access, staff will understand their responsibilities related to accessibility, and we can work together to produce digital products and services that meet the needs of all Americans. Visit Section508.gov and the IT Accessibility/508 Program Manager Playbook to learn more.

