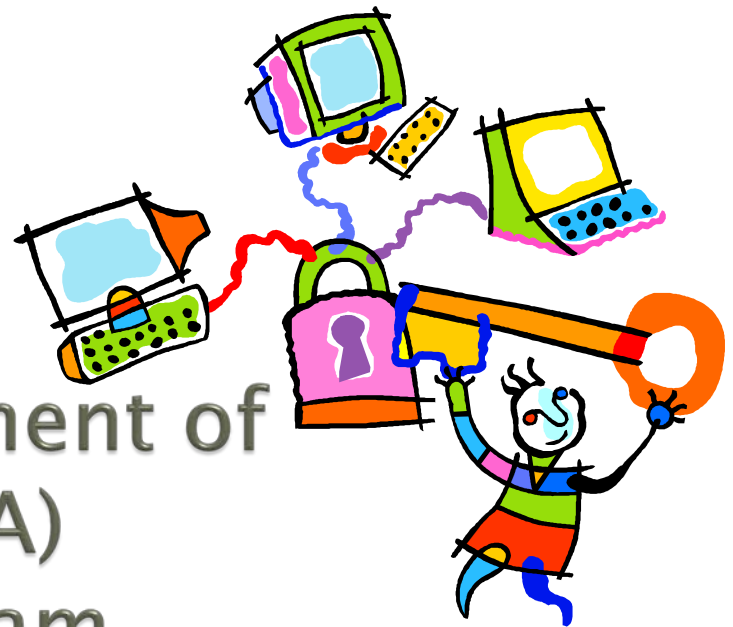


United States Department of Agriculture (USDA) Section 508 Program



Turning the key to unlock and eliminate barriers, by providing accessibility to all!

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Acquisition Training Part I

Objectives

- ▶ Section 508 Awareness
- ▶ Acquisition Roles and Responsibilities
- ▶ Exceptions for Section 508
- ▶ Federal Compliance For Section Awareness
- ▶ Federal Acquisition Regulations (FAR)
- ▶ Section 508 Acquisition Process Awareness
- ▶ Section 508 Templates Review
- ▶ Buy Accessible Wizard
- ▶ Proper Contract Language

Section 508 and the Law

- ▶ Rehabilitation Act of 1973
- ▶ Section 508 Added in 1986
- ▶ Workforce Investment Act of 1998
- ▶ Federal Compliance became effective June 2001
- ▶ Federal Acquisition Regulations (FAR)
- ▶ AGAR Advisory #49

OMB Directives

- ▶ Exhibit 300– CIRCULAR NO. A-11, Part 7 Planning, Budgeting, Acquisition, and Management of Capital Assets, Section 300
- ▶ Exhibit 53– CIRCULAR NO. A-11, Information Technology and eGovernment

FAR Part 39 Acquisition of IT states:

- ▶ When acquiring EIT, agencies must ensure that—
 - (1) Federal employees with disabilities have access to and use of information and data that is comparable to the access and use by Federal employees who are not individuals with disabilities; and
 - (2) Members of the public with disabilities seeking information or services from an agency have access to and use of information and data that is comparable to the access to and use of information and data by members of the public who are not individuals with disabilities.

Importance of Section 508

- ▶ For USDA to create binding and enforceable provisions and incorporate these provisions into the Federal Acquisition Regulations (FAR).
- ▶ Create technical provisions need to be used in all electronic and information technology (EIT) acquisitions of products and services

Why is Section 508 Important?

- ▶ It eliminates barriers for people with disabilities
- ▶ Supports Federal initiatives
- ▶ Benefits everyone
- ▶ Achieves legal compliance
- ▶ Promotes positive public image
- ▶ Facilitates public access to Federal information

It's the law!

What does Section 508 Apply To?

- ▶ Section 508 applies to the Federal Government and the US Postal Service
- ▶ Section 508 applies to ALL contract vehicles and procurement actions, including micro-purchases.
- ▶ All EIT that is “procured, maintained, developed, or used

Your Role As an Acquisition Profession

- ▶ Agencies are responsible for Section 508 compliance, not industry
- ▶ Agencies must determine if and how the Section 508 Standard applies, not industry
- ▶ Agencies must conduct market research to determine Section 508 requirements, not just pick a product
- ▶ Agencies must reflect their Section 508 requirements in acquisition solicitations

Section 508 Standards

▶ Subpart A — General

- 1194.1 Purpose.
- 1194.2 Application.
- 1194.3 General exceptions.
- 1194.4 Definitions.
- 1194.5 Equivalent facilitation.

▶ Subpart B — Technical Standards


- 1194.21 Software applications and operating systems.
- 1194.22 Web-based intranet and internet information and applications.
- 1194.23 Telecommunications products.
- 1194.24 Video and multimedia products.
- 1194.25 Self contained, closed products.
- 1194.26 Desktop and portable computers.

Section 508 Standards

- ▶ **Subpart C — Functional Performance Criteria**
 - 1194.31 Functional performance criteria.
- ▶ **Subpart D — Information, Documentation, and Support**
 - 1194.41 Information, documentation, and support.
- ▶ Subpart C and Subpart D must be filled out in order to meet Section 508 requirements

Section 508 Standards breakdown

▶ 1194.21 Software applications and operating systems. (**Standard**)



(a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.

- (b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.
- (c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that assistive technology can track focus and focus changes.
- (d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to assistive technology. When an image represents a program element, the information conveyed by the image must also be available in text. (**Accessibility Features**)

Exceptions/Waivers and Alternatives Formats

▶ Exceptions

◦ General EIT Exceptions–

- any electronic and information technology operated by agencies, the function, operation, or use of which involves intelligence activities, cryptologic activities related to national security, command and control of military forces, equipment that is an integral part of a weapon or weapons system, or systems which are critical to the direct fulfillment of military or intelligence missions.

◦ Undue Burdens Exceptions

- Are systems that will cause the entire organization to come to a stop (ex. Payroll systems, claims systems for pay)

◦ Commercial Non–availability Exceptions

- When a commercial system is needed to meet the mission and there is no Section 508 COTS system available

Exceptions/Waivers and Alternatives Formats

- ▶ When determining an exceptions, market research must be conducted to make sure that there are no systems that meet the Section 508 requirements
- ▶ If an exceptions is granted, an alternative format must be provided to meet the Section 508 compliance and accessibility
- ▶ Exceptions must be fully documented and a full explanation must be provided for the exceptions along with the alternative format that will be provided.

Acquisition Training Part II

Defining Requirements

▶ Market Research

◦ Buy Accessible Wizard

- The Buy Accessible Wizard is a web-based tool that:
 - Guides users through the acquisition process, gathering data and providing information about electronic and information technology (EIT) and Section 508 compliance
 - Compiles a running summary documenting the process and its results
- The Buy Accessible Products and Services Directory
 - Access to vendor provided accessibility information
- The Buy Accessible System makes compliance with the requirements of Section 508 as easy and thorough as possible
- Government Product Accessibility Template (GPAT)

▶ Product Assessment Template (also known as the VPAT)

Defining Requirements

- ▶ How you are going to test product for Section 508 compliance and accessibility
- ▶ Remediation Plan
- ▶ Section 508 due diligence
- ▶ Acceptance of deliverables
- ▶ Proper contract language
- ▶ How to handle upgrade, fixes, and patches
- ▶ Vendor knowledge of USDA process and procedures
- ▶ Templates for Section 508
- ▶ Section 508 Coordinators
- ▶ Knowledge of Section 508 Refresh

Section 508 Acquisition Process

▶ Statement of Work

- Solicitation (section 508 contract language included in the SOW to tell vendor what standards apply to their product)
- Contract Award (make sure vendor understands what is expected when it comes to Section 508 and their product)
- Evaluation (inform vendor on how your agency is going to test or validate Section 508 and accessibility)
- Delivery and 508 compliance Assessment (all deliverables must be Section 508 compliant upon completion and full acceptance of product)

▶ Request for Proposal (RFP)

- Solicitation (how do you meet the Section 508 Standards and accessibility requirements)
- Evaluation (How well did RFP meet the standards)
- Delivery and 508 compliance Assessment (providing in the vendor on how you will accept products after award for Section 508 compliance)

Acquisition Scenarios

- ▶ Staged during training

Questions ?

