



Section 508 Standards REFRESH

ICT ANPRM Overview

Welcome

This is an overview of the ICT rulemaking AKA the Refresh of the Section 508 and 255 standards and guidelines

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First – a few other exciting things going on!

- White House Section 508 implementation plan – open for comment through 9 April
<http://section508.ideascale.com/>
- 21st Century Communications & Video Accessibility Act
<http://www.fcc.gov/encyclopedia/twenty-first-century-communications-and-video-accessibility-act>
- EO 13548 <http://www.dol.gov/odep/federal-hire/timeline.htm>
- 2010 ADA Standards for Accessible Design
http://www.ada.gov/2010ADAstandards_index.htm

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[Section 508](#) refers to a statutory section in the Rehabilitation Act of 1973 (29 U.S.C. 794d). The primary purpose of Section 508 is to provide access to and use of Federal agencies' electronic and Information Computer Technology (ICT) by individuals with disabilities. This includes, but is not limited to, computers, World Wide Web sites, multimedia, software and web-based software, electronic documents and [forms](#), and office equipment. Section 508 covers both DOL's internal and external (public) facing websites and ICT products. DOL's current [DLMS supporting Section 508](#) implementation at the Department is available on LaborNet for review. Meeting 508 Standards is a requirement for DOL and has been a requirement for Federal Agencies since Section 508 was put into place in 2001. Section 508 is the law.

Section 508 addresses accessibility for people who have:

Visual disabilities

Hearing disabilities

Motor disabilities

Cognitive and learning disabilities

For guidance in meeting Section 508 requirements, and determining which 508 Standards apply to your project or product, please contact **DOL's Section 508 Program Manager**, at Section508@dol.gov (v)202-693-4441 (TTY) 202-693-8064. Your DOL Section 508 Program Manager is available to you as a resource for various supports, assistance and training. You are encouraged to schedule a meeting to discuss your team's 508 needs and concerns.

Who is in charge of Section 508?

[The U.S. Access Board](#) has oversight of the 508 Standards and related [Laws](#) set by Congress. [GSA](#) manages Section 508 and related [Policies](#) for Federal Agencies. [The White House](#) has more recently put into action a call for 508 accountability and responsibility and tasked [DOJ](#) and [GSA](#) to perform an audit of Federal Agencies' compliance to Section 508. DOL responded to the audit, with results submitted to DOJ 29 April 2011. The next Section 508 audit is scheduled to take place Fall of 2012; DOJ will measure the progress of our Agency's 508 supports by comparing the current survey results to those of the FY2012 survey. Now is an exciting time for Section 508 and accessibility. The [508 Refresh](#) is in the final stages of draft and approval. President Obama recently signed [The 21st Century Communications & Video Accessibility Act](#) which will make it easier for people who are deaf, blind or live with a visual impairment to do what many of us take for granted - from navigating a TV or DVD menu to sending an email on a smart phone. This Act sets new standards so that Americans with disabilities can take advantage of the technology others have full access to today. The President has also issued [Executive Order 13548](#) tasking Federal Agencies with increasing federal employment of individuals with disabilities and establishing the Federal Government as a model employer of individuals with disabilities. DOL submitted our response to EO 13548 to OPM on 11 April 2011. In July 2010 the White House also announced the release of [two new rules on the ADA, 2010 ADA Standards for Accessible Design](#). Section 508 is separate from the ADA; however these additional ADA Standards supporting Accessible Design underscore that accessibility to ICT is critical issue, especially when looking to increase the inclusion and hiring of persons with disabilities.

The White House Section 508 strategy is open for comment through Monday 9 April. The announcement is also on [Kareem Dale's White House blog](#)

The dialogue includes high level objectives, initiatives, focus areas, and potential measures. You are welcome to comment on what has been proposed. You may also propose broad management strategies, tactics, and actions that can ultimately help Federal Agencies better comply with Section 508.

The dialogue will be open until Monday, April 9th. [Register to participate in the White House Section 508 Implementation Plan Draft at ideascale.com](#)

Why Refresh?

Statutory requirement:

"The Access Board shall periodically review and, as appropriate, amend the standards to reflect technological advances or changes in electronic and information technology." (Section 508 of the Rehabilitation Act)

"The Board shall review and update the Telecommunications Act Accessibility Guidelines periodically" (Section 255 of the Telecommunications Act)

Changes in technology

11 years since the first Section 508 standards

13 years since the first Telecommunications Act Accessibility Guidelines

Clarify ambiguities in current standards and guidelines

What products are covered?

Improve testability

Effective dates 2001 and 1989

Refresh required by STATUTE

TECHNOLOGY changed

Clarify ambiguities

U.S. Access Board

- 508 Refresh Draft Rule <http://www.access-board.gov/sec508/refresh/draft-rule.htm>
- Current 508 Standards <http://www.access-board.gov/sec508/standards.htm>

Goals for Refresh

“We agree that what is needed are clear, consensus driven, testable, and reliable accessibility requirements. In this world of global scales, it is critical that accessibility requirements be harmonized throughout the world. Product manufacturers want to build to a single set of requirements – or at least not be faced with competing world wide requirements. We should do what we can to facilitate this, because ultimately if we can make the regulatory process easier to achieve – and by that I do not mean that we need to weaken the requirements that exist today – we will enhance accessibility for people with disabilities worldwide.”

*Marc Guthrie, AccessBoard public member
International Workshop on Accessibility Requirements
Brussels, Belgium -- October 21, 2004*

REMIND THE BOARD that THEY

want harmonization,

Want testable and reliable accessibility requirements.

ICT Refresh Steps

- Telecommunications and Electronic and Information Technology Advisory Committee (TEITAC) establishment: July 2006
- TEITAC report: April 2008
- ANPRM and draft text released: March 2010
- Public comment period ended: June 21, 2010
- Review comments
- Second ANPRM: December 8, 2011
- Public comment period ended: 7 March 2012

<http://www.access-board.gov/sec508/refresh/report/>

Why a second ANPRM?

- Public comments show that a significant reorganization is needed
- Public comments raise questions on which the Board needs input
- International harmonization efforts underway

2010 ANPRM favorably received but

-additional public comments is needed

Covered electronic content

FPC approach for limited vision and hearing

FPC and technical relationship: Always conform to FPC

WCAG 2.0 – is allowing nonconforming alternate versions o.k.?

OTHER FEATURES of ICT: content displayed on small screens

Obsolete technologies?

Touchscreens which are NOT tactilely discernible

WCAG 2.0 – are they clear? Should other standards be

referenced?

Key Comments from 2010 ANPRM:

- Better organization of standards
- Inclusion of mobile technology issues
- More user-friendly document
- Stronger harmonization with other standards

These were significant comments or concerns that we incorporated or addressed in the 2011 version

User confused as to how to use the chapters in 2010 ANPRM

i.e., ALWAYS read chapter 1, then what?

More comments:

- Clarification on how to apply the Functional Performance Criteria.
- Clear standards for accessible content
- Paying attention to rulemakings by other agencies, such as FCC and 21st Century Communications and Video Accessibility Act.

REVIEW OF 2011 ICT ANPRM

- 2010 ANPRM v. 2011 ANPRM
- Simplified:
 - Combined several chapters
 - Added Scoping chapter, better harmonization with ADA/ABA AG
- WCAG 2.0 Incorporation by Reference:
 - Must use WCAG 2.0 for web, documents, and applications
- Clarified what Electronic Content is covered

1. Content that is public facing;
2. Content that is broadly disseminated throughout an agency, including templates;
3. Letters adjudicating any cause which is within the jurisdiction of the agency;
4. Internal and external program and policy announcements;
5. Notices of benefits, program eligibility, and employment opportunities and decisions;
6. Forms, questionnaires and surveys;
7. Emergency notifications;
8. Formal acknowledgements and receipts; or
9. Educational and training materials.

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1. Advisories reduced and simplified

Removed non-testable provisions unsupported by research or standards

In practice or implementation, PWD get more access because standard is now enforceable and clearer.

E.g, current 1194.23(f) requires 20DB gain Not followed in practice because more power is required to provide that amount of gain.

18DB gain is doable, and is required by the FCC

2010 ANPRM v. 2011 ANPRM

- 2010
- 100 pages
- 10 chapters
- Cover “official” communications
- either WCAG 2.0 or 508 provisions

- 2011
- 40 pages
- 6 chapters
- Cover 9 types of content
- WCAG 2.0 only

WCAG 2.0 AA!!

2011 ANPRM

- 508 Chapter 1: Application and Administration
- 508 Chapter 2: Scoping Requirements
- 255 Chapter 1: Application and Administration
- 255 Chapter 2: Scoping Requirements
- Chapter 3: Functional Performance Criteria
- Chapter 4: Hardware
- Chapter 5: Platforms and Applications
- Chapter 6: Documentation and Support Services

508 Chapter 1: Application and Administration

- E101 General
- E102 Referenced Standards
- E103 Definitions

508 Chapter 2: Scoping Requirements

- E201 Application
- E202 General Exceptions
- E203 Access to Functionality
- E204 Functional Performance Criteria
- E205 Electronic Content
- E206 Hardware
- E207 Platforms and Applications
- E208 Documentation and Support Services

E201 Application [WHEN & WHERE BUT NOT "HOW"]

E202 General Exceptions [NOT APPLICABLE]

E203 Access to Functionality [WHAT AGENCY DOES]

E204 Functional Performance Criteria [MAKE IT WORK]

E205 Electronic Content [WHAT IS COVERED]

E206 Hardware [USER INTERFACE]

E207 Platforms and Applications [WCAG 2.0]

E208 Documentation and Support Services [EXPLAIN]

Chapter 3: Functional Performance Criteria

- 301 General
- 302 Functional Performance Criteria
 - 302.1 Without Vision.
 - 302.2 With Limited Vision.
 - 302.3 Without Perception of Color.
 - 302.4 Without Hearing.
 - 302.5 With Limited Hearing.
 - 302.6 Without Speech.
 - 302.7 With Limited Manipulation.
 - 302.8 With Limited Reach and Strength.
 - 302.9 Minimize Photosensitive Seizure Triggers.

302.1 Without Vision. Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that does not require user vision.

302.2 With Limited Vision. Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that magnifies, one mode that reduces the field of vision required, and one mode that allows user control of contrast. CHANGED

302.3 Without Perception of Color. Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that does not require user perception of color.

302.4 Without Hearing. Where an auditory mode of operation is provided, ICT shall provide at least one mode of operation that does not require user hearing.

302.5 With Limited Hearing. Where an auditory mode of operation is provided, ICT shall provide at least one mode of operation which improves clarity, one mode that reduces background noise, and one mode that allows user control of volume. CHANGED

302.6 Without Speech. Where a spoken mode of operation is provided, ICT shall provide at least one mode of operation that does not require user speech.

302.7 With Limited Manipulation. Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that does not require fine motor control or operation of more than one control at the same time.

302.8 With Limited Reach and Strength. Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that is operable

Chapter 4: Hardware

- 401 General
- 402 Closed Functionality [SPEECH ENABLED]
- 403 Biometrics
- 404 Preservation of Information Provided for Accessibility
- 405 Flashing
- 406 Standard Connections
- 407 Operable Parts [USER INTERFACE]
- 408 ICT with Two Way Voice Communication
- 409 Caption Processing Technology
- 410 Video Description Processing Technology
- 411 User Controls for Captions and Video Description

Chapter 5: Platforms and Applications

- 501 General [WCAG 2.0]
- 502 Interoperability with Assistive Technology
- 503 Applications
- 504 Authoring Tools

Chapter 6: Documentation and Support Services

- 601 General
- 602 Documentation
- 603 Support Services

Electronic Content: Examples

- Public facing - content posted on the agency website
- Content broadly disseminated throughout an agency - templates
- Letter adjudicating any cause handled by the agency
 - Internal and external program and policy announcements
- Educational and training materials

NOT COVERED:

- Archival records
- Drafts

1. Content that is public facing;
2. Content that is broadly disseminated throughout an agency, including templates;
3. Letters adjudicating any cause which is within the jurisdiction of the agency;
4. Internal and external program and policy announcements;
5. Notices of benefits, program eligibility, and employment opportunities and decisions;
6. Forms, questionnaires and surveys;
7. Emergency notifications;
8. Formal acknowledgements and receipts; or
9. Educational and training materials.

Why use WCAG 2.0?

- Supports International harmonization
 - OMB Circular A119
 - TEITAC recommendation
- Widely-Vetted and deliberate process to develop
- Rich, detailed guidance material
 - Provides resources to enhance implementation

-Developed over 10 years

-Consensus document

-Industry wide accepted practice

-Needs our support

-General policy of the U.S. government to support use of international standards

(OMB Circular A119)

LEVEL AA!!

WCAG 2.0 Overview

“Web Content Accessibility Guidelines”

- Organization:
 - 1. General principles
 - 2. Guidelines
 - 3. Success Criteria (3 levels: A, AA, AAA)

<http://w3.org/tr/wcag>

Sample WCAG Success Criterion

- 1.4.1 Use of Color: Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element. (Level A)

Compare to current Section 508:

- §1194.21 Software applications & OS
 - (i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.

Sample WCAG Success Criterion

- **2.1.1 Keyboard:** 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)

Compare to current Section 508:

- §1194.21 Software applications & OS
 - (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.

Talk about training and trianing materials 😊

WCAG 2.0 Conformance

- Apply to web pages, software, documents
- Must follow all Level A and AA Success Criteria and Conformance Requirements
- International standard for accessible web pages
- Wealth of Guidance Materials
- <http://w3.org/tr/wcag>

WCAG

- **Web Content Accessibility Guidelines**
<http://www.w3.org/TR/WCAG/>
 - WCAG 1.0 finalized 5 May 1999
 - WCAG 2.0 finalized 11 December 2008
- **WCAG GL WG**
 - Guidelines working group
 - from W3C perspective, these are volunteers!

How to meet WCAG

<http://www.w3.org/WAI/WCAG20/quickref/>

WCAG

- Four General Principles
 - Perceivable, Operable, Understandable, Robust
 - Highest level organization
- Twelve Guidelines
- Sixty something Success Criteria
- How to meet WCAG – quick reference tool
<http://www.w3.org/WAI/WCAG20/quickref/>

Remaining questions

1. Overall readability and usability
2. Covered electronic content
3. Functional Performance Criteria (FPC)–
limited sight, limited hearing
4. FPC and technical provisions
5. WCAG 2.0 conforming versions
6. ICT features: screens and batteries
7. Obsolete technology
8. Touch screens
9. WCAG 2.0 or other standards

From 7 March close date of last ANPRM

Final Steps

Develop proposed rule (NPRM)

- Develop regulatory assessment
- Submit to OMB
- Publish NPRM in the Federal Register
- Public comment period (closed 7 March 2012)
- Analyze comments
- Develop final rule
- Develop final regulatory assessment
- Publish Final Rule
- Congress approves – when?? Fall 2012??

Status?

The U.S. Access Board is now reviewing the comments from the public, the 508 and disability communities.

Don't forget about the FAR

The FAR must be updated within 6 months of the Refresh becoming the new 508 Standards.

FAR Subpart 39.2 applies to ICT (E&IT)

<https://www.acquisition.gov/far/html/Subpart%2039.2.html>