



DoD CIO Manual on Implementation of Section 508



Ms. Teresa Takai
 Department of Defense
 Chief Information Officer

Teresa Takai, the Department of Defense Chief Information Officer (DoD CIO), signed the [Section 508 Policy Manual 8400.01-M](#) to support implementing the Section 508 program throughout DoD. “Our nation, our warriors-especially our wounded warriors, count on us to do the right thing and supporting Section 508 is the right thing to do”, said Takai.

This manual assigns responsibilities for Section 508 management and provides procedures for the implementation of the [Section 508 of the Rehabilitation Act of 1973](#) in accordance with [DoDD 8000.01](#).

“In this technologically-focused world, it is important that information and data is accessible for all DoD employees, and others doing business with DoD.”

—Teresa Takai

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AT&L and DoD CIO Sign Joint Memo

The Office of the Under Secretary of Defense for Acquisition, Technology and Logistics (OUSD(AT&L)) and the Office of the DoD Chief Information Officer (DoD CIO) in a collaborative effort, signed the [Joint Memorandum, Improving the Accessibility of Government Information through Section 508 of the Rehabilitation Act of 1973 on March 15, 2012](#). This memo is an update to recent activities regarding compliance requirements and implementation of Section 508.

Ms. Susan Pollack, Senior Procurement Analyst in the OUSD(AT&L), Defense Procurement and Acquisition Policy, and Ms. Arleen Oliver, DoD Section 508 Coordinator, DoD CIO, are lead action officers on this joint effort. The General Services Administration (GSA) reviews Federal Electronic & Information Technology (E&IT) solicitations for accessibility and notifies agencies on whether their IT solicitations meet the Section 508 standards. In some cases, the non-compliant solicitations lacked specificity to identify the appropriate Section 508 Standard.

It's The Law

Public Law 105-220, 29 U.S.C. § 794d; Section 508

Electronic and Information Technology, requires federal departments and agencies, when they develop, procure, maintain, or use electronic and information technology, to ensure that the electronic and information technology allows, regardless of the type of medium of the technology, for:

- Individuals with disabilities who are federal employees to have access to, and use of, information and data that is comparable to the access to, and use of, the information and data by federal employees who are not individuals with disabilities; and
- Individuals with disabilities who are members of the public seeking information or services from a federal department or agency to have access to, and use of, information and data that is comparable to the access to, and use of, the information and data by such members of the public who are not individuals with disabilities.

All federal departments and agencies must comply unless it is determined that compliance would create an undue burden. The law further directs that the Architectural and Transportation Barriers Compliance Board (referred to as the 'United States Access Board'), issue and publish standards for Section 508. Recently, the Access Board released the second Advance Notice of Proposed Rulemaking (ANPRM) to continue the process of updating its standards for electronic and information technology. The Board will follow-up with a Notice of Proposed Rulemaking (NPRM) which will provide an additional round of comments before the rule is finalized.

The law also requires the attorney general to prepare a biennial report and submit it to the President and Congress. This report contains information and recommendations regarding the extent to which the electronic and information technology of the federal government is accessible by individuals with disabilities. Heads of agencies, including Department of Defense, must provide information that the US Attorney General determines is necessary to conduct the evaluations to prepare reports. 🌐

21st Century Communications and Video Accessibility Act

President Barack Obama signed into law the **21st Century Communications & Video Accessibility Act of 2010**. In his remarks, the President emphasized the 20th anniversary of the Americans with Disability Act (ADA) as the foundation for the new law.

“The story of the disability rights movement is enriched because it’s intertwined with the story of America’s progress,” said President Obama. Americans with disabilities are Americans first and foremost, and like all Americans are entitled to not only full participation in our society, but also full opportunity in our society.”

Both the ADA and this new Act, the President said, are about “opportunity,” allowing persons with disabilities to take full advantage of every opportunity that our economy offers, at a time when the economy needs everyone to be able to participate. The Act, which is intended to expand access to Smartphone and digital video, outlines steps to ensure that persons with vision and hearing impairments have full access to the video, voice,



text, and other capabilities of Smartphone’s, digital television, and Internet-based video programming.

“The fight for progress isn’t about sympathy; by the way — it’s about opportunity. And that’s why all of us share a responsibility to keep building on the work of those who came before us — one life, one law, one step at a time,” said Obama. 🌐

GSA Conducts Assessment of DoD Contracts



The General Services Administration (GSA), in an effort to enforce accessibility of federally procured products and services, randomly select federal contracts for review. To date, several DoD Electronic and Information Technology (E&IT) related IT solicitations are being reviewed by GSA for appropriate accessibility language. The results of the GSA findings are reported to the Office of Management and Budget (OMB) quarterly.

The DoD CIO reviews GSA findings with the appropriate DoD Component Acquisition Official and Section 508 Coordinator. The Component provides the DoD CIO with follow up information to validate GSA findings and to provide corrective measures. When findings are not valid; supporting documentation is provided substantiating Section 508 compliance.

DoD CIO Conducts Assessment of DoD Websites



The Section 508 law requires that individuals with disabilities have access and use of information and data that is comparable to individuals without disabilities. [The United States Access Board Standard § 1194.22](#) further elaborates on requirements for web-based intranet and internet information and applications. In an effort to ensure that DoD public websites are accessible, the Office of the DoD CIO, randomly tests DoD websites for accessibility. The testing results are provided to the Component Information Technology (IT) lead to bring websites 508 compliant.

Make Your Agency Website Accessible

Technology is considered “accessible” if it can be used as effectively by people with disabilities as by those without disabilities. This definition does not mean that a visually-impaired user will complete a task on a web site as quickly as one who can see. Listening takes longer than looking at a screen and reading – but the processes must be comparable. So how does the definition of “accessible” help everyone from the web developer to top management know what to do to make websites comply with **Section 508**? The answer is that a definition really doesn’t help much – but assistance is available.

In America alone, it is estimated that more than 54 million people have a disability. With advances in medicine and science as well as an aging population, more and more people who have disabilities, even minor disabilities, are using the computer and going to the web. What is the bottom line? If your web presence is not accessible, those millions will go elsewhere.

Section 508 Homepage: Electronic and Information Technology

[Guidelines and Standards](#) | [Home](#)

Standards issued by the Board under Section 508 of the Rehabilitation Act cover access to electronic and information technology procured by Federal agencies. These standards are part of the Federal government’s procurement regulations. The Board is conducting a joint update of these standards and its [guidelines](#) for telecommunications products.

[Sign up](#) to receive updates on this rulemaking.

UPDATE OF THE STANDARDS

- [Notice on the Release of 2011 Draft](#) [PDF version](#)
- [2011 Draft Updated Standards and Guidelines](#) (available for public comment until March 7, 2012) [PDF version](#)
- [Public Comments on the 2011 Draft](#) (Regulations.gov)
- [Notice of Public Hearings](#)
- [Press Release](#)

Background Material

- 2010 Draft ANPRM
 - [Notice on the Release of 2010 Draft](#) [PDF version](#)
 - [2010 Draft Updated Standards and Guidelines](#) [PDF version](#)
 - [Public Comments on the 2010 Draft](#)
- Advisory Committee (2006 – 2008)
 - [Advisory Committee \(TEITAC\) Report](#)
 - [Committee Members](#)
 - [Index to materials from advisory committee meetings](#)

CURRENT STANDARDS

- [Section 508 Standards](#) [PDF version](#) [Text-to-Speech](#) [Braille Format](#)
 - Spanish: [HTML](#) [Text-to-Speech](#) [Braille Format](#)
 - Japanese: [HTML](#) [Text-to-Speech](#) [Braille Format](#)
- [Preamble](#) (published discussion of the standards)

ABOUT THE CURRENT STANDARDS

- [An Overview](#)
- [Guide to the Standards](#)
- [Accessible Telecommunications Product Design Tutorial](#)
- [Developing Accessible Software Tutorial](#)
- [E-Learning: Conforming to Section 508](#)

The United States Access Board’s Website Standards

Federal Section 508 Laws/Guidance

1. **Workforce Investment Act of 1998**; Public Law 105-220, 29 U.S.C. § 794d; SEC. 508. ELECTRONIC AND INFORMATION TECHNOLOGY
2. **21st Century Communication and Video Accessibility Act of 2010**
- Procedures for Ensuring the Accessibility of Electronic and Information Technology (E&IT) Procured by DoD Organizations
3. **Federal Acquisition Regulation (FAR)** – 48 CFR Parts 2,7,10,11,12, and 39 Sets forth basic policies and general information about the Federal Acquisition Regulations System
4. **July 2010 Memo** – Improving the accessibility of Government Information; July 19, 2010

DoD Section 508 Policies

1. **DoD Directive 8000.01** - “Management of the Department of Defense Information Enterprise,” February 10, 2009
2. **DoD Manual 8400.01-M** - “Procedures for Ensuring the Accessibility of Electronic and Information Technology (E&IT) Procured by DoD Organizations,” June 3, 2011
3. **USD(AT&L) and DOD CIO Joint Memorandum** - “Improving the Accessibility of Government Information through Section 508 of the Rehabilitation Act of 1973”, March 15, 2012.
4. **Defense Acquisition Guidebook (DAG)** - Provides the acquisition workforce with discretionary best practice that should be tailored to the needs of each program



RESOURCE SECTION

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DoD Resources

DoD CIO
<http://dodcio.defense.gov/>

USD(AT&L)
www.acq.osd.mil

USD(P&R) and Wounded Warrior
<http://prhome.defense.gov/WWCTP>

ASD(HA) and CAP
<http://cap.tricare.mil>

Government Resources

www.section508.gov

www.access-board.gov/

email: DoDSection508@OSD.mil



Ms. Dinah F.B. Cohen
Director for DoD
Computer / Electronic
Accommodations
Program (CAP)

The Computer/Electronic Accommodations Program (CAP) “A Friend Indeed”

The Under Secretary of Defense for Personnel and Readiness established the Computer/Electronic Accommodations Program (CAP) in 1990 as the centrally funded assistive technology accommodations program for employees with disabilities in DoD. The CAP mission is to ensure that people with disabilities and wounded Service members have equal access to the information environment and opportunities in DoD and throughout the Federal government in support of the Rehabilitation Act of 1973, as amended. By providing assistive technology and services free of charge to our DoD customers, CAP helps the DoD make its work environments more accessible to people with hearing, visual, dexterity, cognitive, and communication impairments. This fulfills the mission of providing real solutions for real needs and helping to make the Federal government the model employer for people with disabilities. 