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508 Basics for Providing Access and the Impact on Products and Services

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What We Will Cover Today

- Part One - 508 and Rework
- Part Two - Fundamentals of Section 508
- Part Three - Section 508 Toolkit for Product and Service Development

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2

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508 and Rework

Katherine Breidenstine

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Topics

- Our Situation
- How Did this Happen?
- Alternatives Considered
- Decision
- Our Vision for the Future
- Summary

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4


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Our Situation



- Asked to review three computer-based software/training products before going to product review
- All three products are not 508 Compliant
- Stop product release
- All three products require rework
 - People
 - Time
 - Money

} Resources

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5


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How Did This Happen?

- Facts
 - Treated Section 508 as a “place holder” in contracts
 - We did not understand Section 508 requirements
- Original assumptions that are no longer valid
 - No one would question the 508 requirements
 - Others understood 508 requirements

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6


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Alternatives Considered



- Scrap
- Rework
- On-Hold
- Learn more about Section 508



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7

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Decision

- Course of action
 - Learn more about Section 508
 - Contact the Agency 508 Coordinator
- Addressing the issue
 - Make the investment
 - Broaden our understanding
 - Prevent future rework
- Addressing hardships resulting from action
 - Current products would be put on hold
 - Rework

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8



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Our Vision for the Future

- **Goals**
 - Learn more about Section 508
 - Include 508 requirements in the planning process
 - Don't assume Section 508 is understood
- **Future Expectations**
 - Develop a toolkit which will assist in incorporating 508 requirements for products and services in project scopes
 - Eliminate rework caused by not complying with Section 508
- **Timeframe for Expected Results - April 2008**


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Summary

- **Our Situation - Section 508 applies to our Products and Services**
- **How Did this Happen? - Assumptions**
- **Alternatives Considered - Impact of constraints**
- **Decision - Learn more about 508**
- **Our Vision for the Future**
 - Understand 508 requirements
 - Include 508 requirements in the project planning phase
 - Develop a toolkit to help eliminate rework

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Fundamentals of Section 508

Amanda Babcock

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Section 508 of the Rehabilitation Act of 1973 (as amended 1998)

- Section 508 requires all Federal Electronic and Information Technology (E&IT) developed, maintained, procured, and used to be accessible to:
 - All Employees with disabilities
 - All Citizens with disabilities
- 508 applies to all E&IT even if there are no employees with disabilities in the office, branch, or even an entire Agency.

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12

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What is E&IT?

- Includes information technology and any equipment or interconnected system or subsystem of equipment, that is used in the creation, conversion, or duplication of data or information.
- The term does not include any equipment that contains embedded information technology that is used as an integral part of the product, but the principal function of which is not the acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. For example, HVAC (heating, ventilation, and air conditioning) equipment such as thermostats or temperature control devices, and medical equipment where information technology is integral to its operation, are not information technology.
(definition from Section 508)

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13


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E&IT Examples

- E&IT includes:
 - Telephones
 - Information Kiosks
 - Transaction Machines
 - Multimedia and Video (videos, CD, web)
 - Web sites (Internet and Intranet)
 - Computers
 - Software
 - Firmware and Similar Products
 - Office Equipment (i.e., copiers and fax machines)
 - Ancillary Equipment
 - Related Resources (including support service and maintenance)
- Information Documentation and Support (user guides, technical support)




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14




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<h2>Exceptions</h2>		
<ul style="list-style-type: none">• E&IT that:<ul style="list-style-type: none">– Is incidental to a contract– Is used for National Security– Is “Back Office” E&IT– Is Commercially non-available– Imposes an undue burden on the Agency– Requires a fundamental alteration of the product• If the E&IT meets the exception, it is considered compliant with the Section 508 law.		
		15




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<h2>Commercially Non-Available</h2>		
<p>If there is no COTS (commercial-off-the-shelf) product that meets the applicable standards, then the Agency can claim <u>commercial non-availability</u> – since an accessible product does not exist at that time.</p> <p>Note: This exception applies only to COTS products. Technology advances very quickly and this exception may only apply to a product for a limited time until newer technologies that are accessible are developed.</p>		
		16




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<h3>Fundamental Alteration</h3> <p>This means that making the product accessible would require a change in the fundamental characteristic or purpose of the product or service, not merely a cosmetic or aesthetic change. EPA is not required to fundamentally change or alter a product of service in order to meet EPA's technical requirements.</p> <p>**This exception can be applied to products or services that are COTS or are being created for or by EPA.</p>		
	17	




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<h3>Undue Burden</h3> <p>Imposes an undue burden on the Agency Defined as "significant difficulty or expense." However, the Agency must explain why meeting the standards would pose an undue burden for a given procurement action, and must still provide people with disabilities access to the information or data that is affected. Because the Agency's resources are looked at as a whole for justifying an undue burden request, it is not used as an exception very often and cannot be delegated below the SIO.</p>		
	18	




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<h3>508 Standards (36 CFR § 1194)</h3> <ul style="list-style-type: none">• Standards were written by US Access Board and they have the final word on interpretation• Broad Categories such as Software, Computers, Web, etc.• E&IT may fall in more than one category• Standards are available at: www.access-board.gov/sec508/standards.htm	
	19



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<h3>Key thing to know about the standards!</h3> <ul style="list-style-type: none">• The standards are designed to make sure that not one single perceptual sense is required to accomplish a task...and to provide for an alternative to a person when a task relies on one sense...• Categories of standards are for organization and grouping purpose...don't think of the standards as six separate categories without considering the standards as a whole.	
	20

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<h3>Why should I think about 508 early on?</h3> <ul style="list-style-type: none">• The earlier you identify that you need to meet 508 standards, the easier it will be for you to comply.• It costs less to build accessibility into the overall cost at the beginning than it does to retrofit.• You will be using time, resources, and your FTEs allotted to a project more efficiently.		
	21	

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<h3>What if I am using contractors?</h3> <ul style="list-style-type: none">• EPA and the contractors are responsible for 508 compliance.• There is a standard 508 clause in all EPA contracts.• You should still specify that the product needs to be 508 compliant.• You have the responsibility to verify that the end product is 508 compliant.		
	22	

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<h3>When should I think about 508?</h3> <p>At the beginning of a project (and throughout the life of a project), a procurement, development of a statement of work, etc. –</p> <p>Ask yourself – is “it” EIT? If it is not EIT, then you are finished with 508 for this procurement, SOW, etc. If yes, then ask yourself some more questions...</p>		
		23

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<h3>“It” is EIT, so now what?</h3> <ul style="list-style-type: none">– Are there any 508 exceptions that apply? (Certain exceptions apply right from the start)– Are there other considerations such as technical requirements?– What standards may be applicable?– What standards are applicable but cannot be met due to technical requirements - commercial non-availability or fundamental alteration, undue burden?	
	


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Reminder!



Key thing to remember is that some products fall under more than one category of standards. Always make sure you have at least taken a look at the other standards.

Example – a web-based application such as a training module needs to address web standards and software standards.

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25


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EIT Procurements (For COTS)




- Conduct Market Research
- Provide 508 documentation along with your procurement request
- May use EIT Procurement Checklist (<http://intranet.epa.gov/accessibility/procurement/procurement-checklist.htm>), but must attach documentation such as e-mails from vendor, VPAT, Buy Accessible
 - Note: This checklist and accompanying instructions are meant as a process to help you gather the documentation with definitions, resources, explanations, etc.



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26

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<h3>EIT Procurements (COTS) cont.</h3> <ul style="list-style-type: none">• Always document Section 508 for EIT even if it meets an exception.• All purchase requests (PRs) for EIT must be:<ul style="list-style-type: none">– Approved by the requesting office’s approving authority for EIT.	ACCESSIBILITY
	27

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<h3>What about deliverables?...</h3> <ul style="list-style-type: none">• Don’t assume contractor took care of 508 for you because of the standard EPA contract clause.• It is not enough for the contractor to say “it’s 508 compliant”...you (EPA) can say “show me” or explain to me how you met the standards.• EPA is responsible once it accepts the deliverable.	ACCESSIBILITY
	28

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Technical Requirements...



Recommend that the technical requirements clearly state that the EIT deliverables need to be 508 compliant and be specific when you can be.

Example:

- Training video must have closed captions that can be turned on by the user.
- The training video jacket cover must indicate that there are closed captions.
- All video cassette tapes must include the closed captions. The closed captions are not an optional feature only available on certain video tapes upon request.

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29

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How do I know the deliverable is compliant?

- Ask for a description from the contractor on how they met the 508 requirements.
- Check out the deliverable yourself – e.g., put the DVD in the player and see if there are captions, can you use the tab/enter keys on the keyboard instead of a mouse, etc.
- Use the toolkit from this presentation.
- Plan for testing if appropriate early on in the project.
- Some testing can be provided by the Section 508 Coordinator. (limited)

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30



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EPA's Section 508 Team

- OEI, Office of Information Analysis and Access (OIAA) is the lead for the Agency
 - Amanda Babcock, 508 Coordinator (202) 566-0678
 - Members across the program and region offices
- Clarifies policy and what falls under E&IT
- Provides consultation on 508 issues and testing
- Coordinates training


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Section 508 Toolkit for Product and Service Development

Sarah Buchanan


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“508 Toolkit what is that?”



- Where did it come from?
- What’s the purpose?
- What does it include?



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What is it?



The Section 508 Toolkit

- United States Access Board Standards
- Purpose:
 - Provide a menu of 508 standards per category of E&IT deliverable
 - Make your life easier

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34


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What is it?

What does it include:

- Background...
- Instructions & Purpose
- List of 508 Standards
 - Functional performance criteria
 - Information, Documentation and Support
 - Others ...
- Standards by Categories of Deliverables
 - Standards that Always or May Apply
 - What EPA and contractors need to Consider
 - What to look for throughout Development
 - Additional Notes or Resources
- Resources


 35


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“Why do I need it?”




 36

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“Why do I need it?”
Remodeling your Kitchen?



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37

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“How do I use it?”



- What needs to be considered?



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What needs to be considered?

- Functional Performance Criteria
 - More than one perceptual sense or ability



39


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What needs to be considered?

- Accessible Technology
 - “Any item, piece of equipment, or system, ... that is commonly used to increase, maintain, or improve functional capabilities of individuals with disabilities.” (§ 1194.4)
 - Examples:
 - Screen Readers,
 - Computers,
 - Telephones,
 - Software packages...



40

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“How do I use it?”

Helps you discover:

- What EPA and Contractors need to know and do.
- What the needs to consider when developing a product or service.

 41

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Caveat

Toolkit:

- Doesn't cover everything
- Situational
 - Resources
 - Audience



 42


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Resources

For more information go to:


- Accessibility Homepage:
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- Section 508, Accessibility and Web Design
- United States Access Board
- Section508.gov
- EPA Section 508 Coordinator
- Contracting Office


 43 **ACCESSIBILITY**




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Questions?



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<p>Contact us!</p> <ul style="list-style-type: none">• Amanda Babcock<ul style="list-style-type: none">– Email: Babcock.Amanda@epa.gov– Phone: 202-566-0678• Katherine Breidenstine<ul style="list-style-type: none">– Breidenstine.Katherine@epa.gov– Phone: 202-564-1511• Sarah Buchanan<ul style="list-style-type: none">– Buchanan.Sarah@epa.gov– Phone: 202-564-1204 <p> OFFICE OF ENVIRONMENTAL INFORMATION</p>	ACCESSIBILITY