

# SECTION 508



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## **Section 508: Basics for Providing Access for All and Barriers for None**

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## What We Will Cover Today

- What is Section 508?
- What is EIT?
- When should I think about Section 508?
- 508 Resources at EPA

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## Section 508 of the Rehabilitation Act of 1973

- 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

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## When 508 Applies

- 508 applies to all E&IT even if there are no employees with disabilities in the office, branch, or even an entire Agency
- 508 only applies to the Federal Government

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## What is E&IT?

Includes information technology and any equipment or interconnected system or subsystem of equipment, that is used by a Federal agency/employee in the creation, conversion, or duplication of data or information.

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## What EIT is Not\*

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.

**\*For Section 508 purposes.**



## E&IT Examples

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

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## 508 Standards (36 CFR § 1194)

- Standards were written by US Access Board and they have the final word on interpretation
- Broad Categories such as Software, Computers, Web, etc. and E&IT may fall in more than one category
- Standards are available at:  
[www.access-board.gov/sec508/standards.htm](http://www.access-board.gov/sec508/standards.htm)

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## Exemptions

- E&IT that:
  - 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 is exempt, it is considered compliant with the Section 508 law.

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## Commercially Non-Available

Applies **only** to COTS – commercial-off-the-shelf products. If there is no COTS product that meets the applicable standards, then the Agency can claim commercial non-availability – since an accessible product does not exist at that time.

It is important to note that 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.

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## Fundamental Alteration

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 or service in order to meet EPA's technical requirements.

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## Undue Burden

- 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.

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## What are these responsibilities?

It is everyone's responsibility at EPA to provide accessible E&IT whenever they procure, create, maintain, and use E&IT in accordance with Federal law, Access Board standards, and EPA policy.

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## Is it E&IT?

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## Video Tape

- 1) Blank
- 2) Training



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## Laptop



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## Digital Clock



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## Software/ CDs/ DVDs



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## Telephone Closet



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## Defibrillator



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## Digital Camera



**S45 Pictured**

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## EPA and Section 508

- What are these responsibilities and who is responsible?
- When should I think about 508?
- Who can help?
- Are there other resources?

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## Specific Responsibilities for PRs

All purchase requests (PRs) for EIT must be:

- Approved by the requesting office's Senior Information Official (SIO), or Information Management Officer (IMO), Division Director or Branch Chief
- Undue burden and undue burden class determination cannot be approved below the SIO level

Refer for Agency procedures to:

<http://intranet.epa.gov/oei/imitpolicy/qic/ciopolicy/eit-procedures033006.pdf>

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## When should I think about 508?

At the beginning (and throughout the life of) a project, a procurement, development of a statement of work, etc.

- Ask yourself – is “it” EIT? Does Section 508 apply?
- Are there other considerations such as technical requirements?
- What standards may be applicable?
- Are there any 508 exceptions that apply?



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## Why should I think about 508 early on?

- The earlier you identify that you need to meet 508 standards, the easier it will be for you to comply.
- Cost less to build accessibility into the overall cost at the beginning than it does to pay retrofitting costs.
- You will be using time, resources, and your FTEs allotted to a project more efficiently.
- If you are using contractors for your project, you can specify that the product needs to be 508 compliant. (You still have the responsibility to verify that the end product is 508 compliant.)

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## OEI's Section 508 Team

OIAA is the lead for the Agency

– Amanda Babcock, 508 Coordinator

([babcock.amanda@epa.gov](mailto:babcock.amanda@epa.gov); 202 566-0678)

- Clarifies policy and what falls under E&IT
- Provides consultation on 508 issues
- Coordinates training

Note: OEI works with a team of members across the program and region offices who serve as POCs for program offices and regions

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## EPA's Accessible E&IT Policy

- Policy issued by CIO 04/05/06
- Accessible Electronic and Information Technology Policy  
<http://www.epa.gov/irmpoli8/ciopolicy/2100.1.pdf>
- Accompanying Procedures and Standards  
<http://www.epa.gov/irmpoli8/ciopolicy/eit-procedures033006.pdf>

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**Accessibility Home**  
Basic Information  
FAQs  
Disability Laws  
Policies  
508 Standards  
Assistive Technology  
Accessibility Support Services  
E&IT Procurement  
Developer Resources  
Training  
Glossary  
Related Links  
Sitemap

**What's new**  
Section 508 Micro-purchase Questions and Answers

**User Resources**  
Assistive Technology  
Assistive Technology Center (ATC)  
Computer/Electronic Accommodations Program (CAP)  
Guidance on Filing Complaints  
EPA Local Reasonable Accommodation Coordinators

**Manager Resources**  
Procurement  
508 Standards  
Understanding Disabilities  
Computer/Electronic Accommodations Program (CAP)  
EPA Local Reasonable Accommodation Coordinators  
Guidance for Helping Blind/Low Vision Employees

**Developer Resources**  
Design/Develop Tips  
508 Standards  
Testing Techniques  
Vendor Accessibility Web Sites  
Understanding Disabilities

**508 Standards**  
Guidance and tips for designing electronic and information technology so that it is accessible to disabled users.  
Accessibility standards  
Techniques for developing accessible electronic and information technology  
Tools to evaluate accessibility

**Assistive Technology (AT)**  
Description of software and hardware products available to assist EPA employees with disabilities.  
Visual  
Hearing  
Dexterity  
Mobility  
Cognitive  
Speech

**Accessibility Support Services**  
EPA support services available to staff who are responsible for ensuring electronic and information technology accessibility and to employees who require assistive technology.  
Section 508 Workgroup  
Assistive Technology Center (ATC)  
Internet Service Center  
Computer / Electronic Accommodations Program (CAP)

**Procurement**  
Information about EPA responsibilities for purchasing accessible products.  
Procurement requirements  
Micro-purchases

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11/14/2007

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## Assistive Technology Center (ATC)

- Located at Headquarters in Washington, DC
- ATC works with employees, managers, and IT support to find accessible solutions for users
- Provides a place where system developers and users can test applications and web sites for compliance
- Contact Elaine Davis, (202) 566-1461

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## Other Resources

- Section508.gov – maintained by GSA and provides online training modules and other resources  
[www.section508.gov](http://www.section508.gov)
- Access Board 508 website – technical and practical guides for the standards  
[www.access-board.gov/508.htm](http://www.access-board.gov/508.htm)
- Office of Public Affairs (OPA) and OEI have regular “webinar” trainings on-line (training is called “Section 508, Accessibility and Web Design”)  
<http://www.epa.gov/productreview/training/schedule.html>

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## Additional Training

- Section 508 Training can be provided upon request that is geared to your office's specific training needs/concerns.
- Cost of training is free and is conducted by the Agency's 508 Coordinator.
- Cost of travel may need to be covered by the requesting office if outside of Washington, DC.

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