



DCMA Manual 4401-18

Information and Communication Accessibility Service

**Office of Primary
Responsibility
Capability**

Organizational Infrastructure

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Resource Page Link:

[https://dod365.sharepoint-mil.us/sites/DCMA-BCF-
Information_Technology_Management/SitePages/4401-18r--
Information%20and%20Communications%20Accessibility%20Ser
vice.aspx](https://dod365.sharepoint-mil.us/sites/DCMA-BCF-Information_Technology_Management/SitePages/4401-18r--Information%20and%20Communications%20Accessibility%20Service.aspx)

Approved by:

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Purpose: This issuance, in accordance with the authority in DoD Directive 5105.64, "Defense Contract Management Agency (DCMA)," DoD Directive 8000.01, "Management of the Department of Defense Information Enterprise," and DoD Manual 8400.01-M, "Accessibility of Information and Communications Technology (ICT)":

- Implements policy and assigns responsibilities pursuant to Section 508 of the

- Rehabilitation Act of 1973, as amended, Section 794d of Title 29, United States Code
- Ensures appropriate inclusion of Section 508 accessibility requirements into standard operating procedure

SUMMARY OF CHANGES

This Manual was rewritten. All agency stakeholders should read this issuance in its entirety. The following identifies the most notable changes:

- Establishes a secondary acceptable Section 508 Information and Communications Technology product assessment Accessibility Conformance Reports in addition to Voluntary Product Accessibility Templates
- Renames Voluntary Product Accessibility Template to Voluntary Product Accessibility Templates
- Discontinues the use of DCMA 360 and establishes the transition to DCMA DoD365-J
- Specifies Section 508 applicable requirements are incorporated in all Agency Information and Communications Technology Inventory procurements and not just Information Technology Directorate Information and Communications Technology procurements
- Introduces new assistive technology alternate formats/methods of communication
- Discontinues Micro Purchases as an accepted Section 508 Exception
- Establishes Section 508 Maturity Assessment/Fielding Procedure
- Specifies all Information and Communications Technology requests for reasonable accommodations shall be formally documented and archived according to established DCMA procedures
- Establishes the DCMA Reasonable Accommodation Form requirement for all reasonable accommodation requests
- Establishes that the DCMA 508 Grievance and Compliant Process (External) Process and the DCMA 508 Grievance and Compliant Process (Internal) Process is available on the Resource page
- Establishes that if an employee has difficulty accessing DCMA webpages or documents while using their assistive technology and/or if they have suggestions for how the DCMA Section 508 Program Management Office may improve accessibility, to the employee should contact the page's Site Manager/Webmaster or the Section 508 Coordinator
- Discontinues Back Office as a Section 508 exception
- Establishes DCMA DoD365-J Section 508 Managers' Internal Control Programs Processes location
- Establishes a new Section 508 roles and responsibilities
- Separates and better defines the roles and responsibilities of Requiring Official(s) and Procurement Contracting Officers
- Establishes the roles and responsibilities of all DCMA employees (both federal and contractors)
- Implements the Agency Section 508 Determinations and Findings Form Procurement Requirement

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SECTION 1: GENERAL ISSUANCE INFORMATION

1.1. APPLICABILITY. This issuance applies to all DCMA activities and delegated contract oversight responsibilities to DCMA once service and support is requested, unless higher-level regulations, policy, guidance, or agreements take precedence.

1.2. POLICY. It is DCMA policy to follow Section 508 law by:

a. Complying with Section 794d of Title 29, United States Code (U.S.C.) to provide for reasonable accommodation (RA) or modifications to facilitate access to Information Technology (IT) systems by covered individuals with disabilities.

b. Complying with Section 791 of Title 29, U.S.C., which requires that a covered employee or applicant for employment with a disability be reasonably accommodated.

c. Executing this Manual in a safe, efficient, effective, and ethical manner throughout the Agency.

SECTION 2: ROLES AND RESPONSIBILITIES

2.1. CHIEF INFORMATION OFFICER (CIO). The CIO will:

- a. Have primary responsibility for the supervision and coordination of the design, acquisition, maintenance, use, and disposal of IT by DCMA.
- b. Be the DCMA principal officer in the Agency charged with managing the implementation of Section 508 Information and Communications Technology (ICT) standards in the Agency. In this role, the CIO manages all Agency-wide activities, correspondence, and reporting to the General Services Administration, Office of Management and Budget, and the Department of Justice (DOJ) concerning Section 508, and the Agency's performance under Section 508.
- c. Establish the requirements within the Agency for acquiring ICT. The CIO's oversight consists of approving IT investments as well as monitoring and evaluating if the investments' performance requirements include DCMA's implementation of Section 508.
- d. As a member of the Section 508 Coordination Team:
 - (1) Advise the Office of the Secretary of Defense and DCMA on matters pertaining to the implementation of Section 508.
 - (2) Work closely with Government agencies to ensure ICT is accessible to persons with disabilities.
 - (3) Develop a critical factor specifically related to accessibility in the capital planning and investment control process.
- e. Work closely with Government agencies to ensure that ICT is accessible by:
 - (1) Developing a plan to identify needs for accessible systems and adaptive technology and identifying IT deficiencies that impact performance of persons with disabilities in current and prospective IT systems.
 - (2) Developing a charter to further define roles and responsibilities of the ICT Accessibility Coordinators in their respective departments.
 - (3) Responding to future DOJ Section 508 surveys.
 - (4) Advising DCMA of the requirement to integrate Section 508 into their IT capital, budget, and strategic plans.
 - (5) Participating in monitoring, measurement, and disclosure activities including usability testing and priority setting.

(6) Identifying current needs for accessible systems and adaptive technology (hardware/software) and identifying ICT deficiencies that impact the performance of persons with disabilities in both current and prospective ICT systems.

(7) Coordinating response to DOJ Section 508 surveys and aggregating results from Section 508 Coordinators.

(8) Developing a recommended list of sources of education and training for key personnel within the department related to Section 508 implementation.

(9) Recommending a policy on implementation and enforcement.

(10) Publicizing the existing complaints process in accordance with (IAW) Title 42, as amended; U.S.C., Public Law 88-352, also referred to in this Manual, Title VII of the Civil Rights Act of 1964, as amended.

(11) Providing opportunity for suggestions and feedback from DCMA internal and external customers, including persons with disabilities.

(12) Developing a webpage for information sharing on the Office of the Chief Information Officer (OCIO) intranet.

(13) Testing public websites.

(14) Coordinating and reporting on the efforts of their agencies, offices, or mission areas to comply with Section 508.

(15) Working closely with all Agency legal, technical, and specialty experts in the organization to ensure implementation of Section 508.

(16) Coordinating compliance and remediation efforts of DCMA DoD365-J Site Managers.

2.2. AGENCY SECTION 508 COORDINATOR. The Section 508 Coordinator position resides in the IT Directorate and reports to the DCMA CIO. The Section 508 Coordinator will:

a. Lead the Agency's efforts to assemble a Section 508 Team to develop and execute a Section 508 implementation plan.

b. Establish intra-agency teams according to the structure of their respective directorates or departments and the available resources.

(1) Intra-agency Team Members will be responsible for understanding, implementing, and disseminating information regarding Section 508 Standards to their respective components.

(2) Under the leadership of the Coordinator, the team will determine the contents of the implementation plan and a strategy for evaluating the success of Section 508 implementation for DCMA projects.

c. All DCMA Federal Employees and Contractors shall coordinate the following activities.

(1) Provide support and coordination between DCMA Staff Offices/Directorates and the Departmental Section 508 Program.

(2) Ensure applicable Section 508 solicitation language is included in all ICT procurement packages.

(3) Support DCMA Section 508 Coordinators at the project level and Section 508 Clearance Officers in reviewing completed Accessibility Conformance Reports (ACRs)/Voluntary Product Accessibility Templates (VPATs) and/or DCMA Section 508 Product Assessments and making determinations as to the compliance of the associated ICT with applicable Section 508 accessibility standards.

(4) Review and approve/certify all DCMA Section 508 exception requests and recommend to the DCMA Section 508 Official the appropriate action(s).

(5) Develop required reports and/or coordinate/complete required surveys on Section 508 exceptions and other Section 508 activities and submit the results to the DCMA Section 508 official for review.

(6) Provide information to the Agency on DCMA procedures and the steps being taken within the Agency to implement Section 508.

(7) Provide technical assistance on Section 508 issues.

(8) Coordinate completion of the biennial DOJ Section 508 survey for DCMA input into the Agency's final report.

(9) Represent DCMA at federal meetings, conferences, and training sessions on Section 508.

(10) Ensure that adequate Section 508 training is available for all DCMA current and future staff.

(11) Provide analysis and recommendations to the CIO concerning the implementation and enforcement of Section 508.

(12) Advise the CIO in determining the proper course of action when a proposal falls outside the boundaries of Section 508.

(13) Report the Government-Wide Section 508 Assessment to the Office of Management Budget and General Services Administration (GSA) on DCMA Section 508 compliance annually.

2.3. REQUIRING OFFICIAL(S). The Requiring Official(s) is(are) the person(people) who generate(s) the request for or specifies the ICT product or service to be acquired, developed, or maintained. Requiring Officials reside throughout DCMA and will:

a. Monitor the Access Board standards for changes in technology and must revise Agency procurement policies and directives, as necessary, to incorporate the revisions.

b. Use the GSA Accessibility Requirements Tool (ART) to develop applicable Section 508 contract language for use in procurements.

c. Review and comment on updates/revisions to the Federal Acquisition Regulation (FAR) language.

d. Refer Agency personnel involved in ICT procurements to appropriate Agency and external resources to ensure Section 508 requirements are incorporated as applicable for the ICT Inventory. Requirements can be found on Section 508's website located on the Resource Page.

e. Ensure that undue burden "significant difficulty or expense" documentation, when appropriate, is prepared and maintained within that contract file.

f. Ensure that all procurements apply the Agency's market research and requirements development procedures to contracting actions.

g. Be consistent with the FAR, the "Purchaser/Requestor" or "Requiring Official" -- will ensure that the acquisition of ICT products and services meet the Section 508 ICT accessibility standards, unless an exception applies.

h. Conduct market research to find those products or services meeting the Section 508 Standards (using vendor websites and the Section 508 websites, which will link to vendors who describe their accessibility).

i. Determines whether commercial ICT will be available in time to meet the need specified by the program or requesting official and whether providing conforming ICT would be an undue burden.

j. Identify which standards apply to the procurement.

k. Identify which standards, if any, would not apply in procurement because of non-availability or undue burden and provide written documentation to the Contracting Officers (KO) for inclusion in the contract file.

1. Draft Performance Work Statement (PWS), Statement of Work (SOW), and Statement of Objectives (SOO) technical specifications and minimum requirements to be submitted with the purchase request.

2.4. PROCUREMENT CONTRACTING OFFICER (PCO) AND KO. The PCO and KO, part of the Contract Directorate, will:

a. Review PWSs, SOWs, SOOs, and purchase requests to ensure they include the applicable requirements for Section 508 compliance.

b. Ensure that solicitations for electronic and IT include a clear statement of the responsibilities vendors or service providers have in supplying products or services which conform to DoD cybersecurity requirements and to Section 508 Standards.

c. Include in the contract file:

(1) Vendor-provided documentation relating to conformance of the offered products and services with Section 508 Standards (usually in the form of an ACR/VPAT or other statement).

(2) Documentation from the requestor/Requiring Official regarding undue burden or non-commercial availability determination.

(3) If an undue burden causes the requestor/Requiring Official to determine that conforming to Section 508 standards presents an undue burden in the acquisition, an explanation of the “alternative means” for access to the same information should be included in the procurement file.

2.5. SOFTWARE AND WEB APPLICATION DEVELOPER. The developers will utilize the Section 508 accessibility checklist during application development and:

a. Ensure applications are planned and developed in compliance with Section 508 ICT Accessibility Standards. Addressing accessibility requirements early in the development cycle facilitates accessibility and compliance with Section 508 standards much more effectively than modification of software and webpages late in the development cycle. Developers have a special role in ensuring that their products conform to Section 508 standards. To assist web developers and webmasters in assessing whether webpages and applications conform to Section 508 standards, commercial tools are available that perform automated as well as assisted evaluations of webpages.

b. The 508 Accessibility Checklists (located on the Resource Page) can be used as a guide to the technical issues to be addressed in software, webpages, and web application development. Developers may download a demonstration version of a screen reading program, such as Job Access with Speech from Freedom Scientific, to use in testing the usability of the application with screen reading software.

2.6. CONTENT DEVELOPER AND REMEDIATOR. The content developer and remediator will utilize Section 508 Document Authoring Guides and Testing Checklists during electronic content/document development to:

a. Ensure public facing content and Agency Official Communications are planned, developed, and delivered in compliance with Section 508 ICT Accessibility Standards. Addressing accessibility requirements early in the development cycle facilitates accessibility and compliance with Section 508 standards much more effectively than modification of electronic content/documents in the development cycle. Content developers and remediators have a special role in ensuring that their products conform to Section 508 standards. To assist content developers and remediators in assessing, remediating, and conformance to Section 508 standards, commercial tools are available that perform automated as well as assisted evaluations of electronic content/documents.

b. The Section 508 Authoring Guides and Testing Checklists (located on the Resource Page) can be used to address electronic content/document development and remediation. Developers and Remediators may use the built-in accessibility checkers found in Microsoft Suite Products and Adobe Acrobat and/or download a demonstration version of a screen reading program, such as Job Access with Speech from Freedom Scientific, to use in testing the usability and accessibility of the document/electronic content.

2.7. SECTION 508 COORDINATION TEAM. The Section 508 Coordination Team consists of the Section 508 Advisory Board, Section 508 Program Staff members (functional subject matter experts), DCMA Information Managers, and DCMA DoD365-J Site Managers. All groups, except those on the Advisory Board outside of IT, report to the OCIO, and/or the Section 508 Coordinator. The Coordination Team will:

a. Ensure systematic accountability for the accomplishment of Section 508 requirements in the Agency. The work of the Team will support the Director's goal to make DCMA a model employer.

b. The Section 508 Advisory Board is composed of:

- (1) Executive Director, Information Technology Directorate (DCMAIT).
- (2) Executive Director, Contracts (DCMA-AQ).
- (3) Director, Equal Employment Opportunity (EEO) Office (DCMA-DDO).
- (4) Executive Director, Total Force (DCMA-TF).
- (5) General Counsel, Office of General Counsel (DCMA-GC).
- (6) Director, Corporate Operations (DCMA-DC).
- (7) Government Workers Union.

c. Meet once a quarter to provide status of agency compliance and receive council on bringing to compliance/increasing Section 508 Compliance.

d. The DCMA Information Managers are assigned to each of the major business and Contract Management Offices, including DCMA International, Special Programs and Regions. They will:

(1) Receive the DHS Trusted Tester Certification by completing the following courses; FACA-ALL-049-B -What Is Section 508 and Why Is It Important, DHSA-TT-100-A Section 508 Standards for Web, DHSA-TT-150-A Trusted Tester Tools for Web on Windows, DHSA-TT-200-A Trusted Tester - Training for Web on Windows, DHSA-TT-201-A Trusted Tester - Practice Exam for Web on Windows, and DHSA-TT-202-A Trusted Tester - Certification Exam for Web on Windows.

(2) Provide technical assistance on Section 508 issues within the business component.

(3) Review new purchase requests originating within the DCMA business component to ensure DCMA's compliance with federal requirements relative to Section 508.

(4) Review all Section 508 exception requests originating within the DCMA business and collaborate with the DCMA Section 508 Coordinator to determine the appropriate action(s) to be taken.

(5) Review completed ACRs/VPATs and/or DCMA Section 508 Product Assessments within the business component and make determinations as to the compliance of the associated ICT with applicable Section 508 accessibility standards.

(6) Review electronic content/documents acquired or created by the DCMA component for Section 508 compliance IAW applicable Section 508 accessibility standards before the communications are released.

(7) Ensure the development and completion of remediation plans for ICT identified as non-compliant with Section 508 and the responsibility of the DCMA.

(8) Develop required monthly reports and/or coordinate/complete required surveys regarding Section 508 activities within the DCMA business component and submit the results to the DCMA Section 508 Program Staff for review in clean text.

(9) Work with team members to develop accountability checklists to assist DCMA mission areas and agencies with Section 508 implementation.

(10) Ensure respective Site Managers perform duties as listed and remediate non-compliant websites/documents.

e. The DCMA DoD365-J Site Managers will:

- (1) Complete all required Section 508 training.
- (2) Review electronic content/documents acquired or created by the DCMA component for Section 508 compliance IAW applicable Section 508 accessibility standards before the communications are released.
- (3) Perform regular audits of respective directorate level site pages, lists, libraries, and documents using a combination of automated and manual checkers.
- (4) Develop required reports and or coordinate/complete required surveys regarding Section 508 activities within the business component and submit the results to the Section 508 Coordinator for review.
- (5) Ensure the development and completion of remediation plans for ICT identified as non-compliant with Section 508.

2.8. THE SECTION 508 CLEARANCE OFFICER. The Section 508 Clearance Officer will provide support by reviewing completed ACRs/VPATs and/or DCMA Section 508 Product Assessments and making determinations as to the compliance of the associated ICT with applicable Section 508 accessibility standards.

2.9. THE INFORMATION MANAGER. The Information Managers are assigned to each of the major business and Contract Management Offices, including DCMA International, Special Programs and Regions. They will:

- a. Complete all required Section 508 training.
- b. Provide technical assistance on Section 508 issues within the business component.
- c. Review new purchase requests originating within the DCMA business component to ensure DCMA's compliance with federal requirements relative to Section 508.
- d. Review all Section 508 exception requests originating within the DCMA business and collaborate with the DCMA Section 508 Coordinator to determine the appropriate action(s) to be taken.
- e. Review completed ACRs/VPATs and/or DCMA Section 508 Product Assessments within the business component and make determinations as to the compliance of the associated ICT with applicable Section 508 accessibility standards.
- f. Review electronic content/documents acquired or created by the DCMA component for Section 508 compliance IAW applicable Section 508 accessibility standards before the communications are delivered, posted, and/or shared.

g. Ensure the development and completion of remediation plans for ICT identified as non-compliant with Section 508 and the responsibility of the DCMA.

h. Develop required monthly reports and/or coordinating/completing required surveys regarding Section 508 activities within the DCMA business component and submit the results to the DCMA Section 508 Program Staff for review in clean text.

i. Work with team members to develop accountability checklists to assist DCMA mission areas and agencies with Section 508 implementation.

j. Ensure respective Site Managers perform duties as listed and remediate non-compliant websites/documents.

2.10. ALL DCMA EMPLOYEES. All DCMA employees will support the DCMA Section 508 Program Management Office (PMO) Mission in fostering a more inclusive environment for DCMA employees, customers, and the public by familiarizing and applying best practices and strategies for the development and purchase of all ICT products and services.

SECTION 3: THE LAW AND RELATED BACKGROUND

3.1. BACKGROUND.

a. Section 508 of the Rehabilitation Act Amendments of 1998, signed into law on August 7, 1998, as a part of the Workforce Investment Act, requires that when federal agencies develop, procure, maintain, or use ICT, they will ensure that the ICT allows federal employees with disabilities to have access to and use of information and data that is comparable to the access to and use of information and data by federal employees who are not individuals with disabilities, unless an undue burden would be imposed on the Agency.

b. Section 508 was revised and published in the Federal Register on January 18, 2017, and became effective on March 21, 2018. The revised rule updated the terminology electronic and IT to ICT. The revised version also includes a broad application of the Web Content Accessibility Guidelines (WCAG) 2.1 Level A and AA success criteria and conformance requirements. Section 508 also requires that individuals with disabilities, who are members of the public seeking information or services from a federal Agency, have access to and use of information and data that is comparable to that provided to the public who are not individuals with disabilities, unless an undue burden would be imposed on the Agency.

c. By law, Section 508's enforcement provisions apply only to ICT procured on or after January 18, 2018. While Section 508's enforcement mechanisms apply only to procurement, Section 504 of the Rehabilitation Act Amendments of 1998 requires access to federal programs for persons with disabilities, and Section 501 of the Rehabilitation Act Amendments of 1998 requires accommodation of federal employees with disabilities. Therefore, Section 508 cannot be used by federal departments and agencies to avoid responsibilities under Sections 501 and 504 to provide equivalent facilitation or alternative means of access to information for employees or members of the public with disabilities.

d. Section 508 provides specific standards as measures for federal departments and agencies, but federal departments and agencies still are required, under Section 504, to provide access to information and programs for persons with disabilities, even in those circumstances where ICT is not commercially available. If an undue burden claim prevents the procurement of ICT that is accessible, agencies still will provide alternative means for access.

3.2. DEFINITION OF INFORMATION AND COMMUNICATION TECHNOLOGY.

a. In the standards published by the Access Board on ICT, the definition of ICT 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 also includes, but is not limited to, telecommunications products (such as telephones), information kiosks, transaction machines, internet sites, multimedia, and office equipment such as copiers and fax machines.

b. The term ICT does not include any equipment that contains embedded IT 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, heating, ventilation, and air conditioning equipment such as thermostats or temperature control devices, and medical equipment where IT is integral to its operation, are not IT.

3.3. ICT ACCESSIBILITY STANDARDS (TECHNICAL STANDARDS).

a. Section 508 required the Access Board to develop accessibility standards for ICT. The ICT accessibility standards published by the Access Board include technical provisions for the functionalities of ICT and includes performance-based requirements which deal with the functional capabilities of ICT.

b. The technical provisions include:

(1) Scoping and technical requirements (Appendices A and B of the Access Board's standards).

(2) Functional performance criteria relating to the functional capabilities of covered technologies.

(3) Requirements for information, documentation, and support.

(4) The previous ICT accessibility standards as originally published on December 21, 2000.

c. The function-specific provisions address the following areas (each has several subsections):

(1) Hardware.

(2) Software.

d. While the technology-specific provisions of the Access Board's standards provide the standards for each specific category of product, the functional performance criteria should be used in evaluating whether the product meets Section 508 requirements overall and should be used for evaluating technologies or components where no specific requirement is found in the function categories. These functional criteria were included to assure that the components of ICT -- even when individually accessible -- still work together to create an accessible product.

e. The functional criteria address the operation of the product including input and control functions, the operation and access to visual and audible information. These criteria support the ability of people with sensory or physical disabilities to locate, identify, and operate input, control the mechanical functions, and to access the information provided, including text, static or dynamic images, icons, labels, sounds, or incidental operating cues. For example, one provision requires at least one mode of operation and information retrieval should be provided that does not require user vision, or that it provides support for assistive technology used by people who

are blind or visually impaired. Another provision requires that at least one mode of operation and information retrieval is provided that does not require visual acuity greater than 20/70.

f. ICT standards deal with access to all information, documentation, and support provided to end users (employees) of covered technologies. At DCMA, this includes user guides, installation guides for end-user installable devices, and customer support and technical support communications. ICT standards require that such information must be available in alternate formats upon request at no additional charge. Alternate formats or methods of communication can include braille (hard copy and refreshable braille displays) text, cassette recordings, large print, electronic text, internet postings, Teletypewriter (TTY) for the deaf access, and captioning and audio description for video materials.

g. The market research stage is the part of the procurement process during which the Agency determines both whether commercial ICT will be available in time to meet the need specified by the program or requesting official and whether providing conforming ICT would be an undue burden. For the purpose of these determinations, the determining official is the Requiring Official.

3.4. FAR.

a. In implementing the Access Board's regulations, the FAR incorporated the ICT accessibility standards (Part 1194, of Title 36, Code of Federal Regulations (CFR)) into acquisition planning, market research and when describing Agency needs. Section 508 uses the federal procurement process as the mechanism for ensuring that ICT acquired by the Federal Government is accessible.

b. The FAR (Subpart 39.2 - Information and Communication Technology) ruling applies to delivery orders, tasks orders, and contracts awarded on or after June 25, 2001.

3.5. COMPUTER/ELECTRONIC ACCOMMODATIONS PROGRAM (CAP).

a. The Under Secretary of Defense for Personnel and Readiness established the CAP in 1990 as the centrally funded RAs program for employees with disabilities in the DoD. IAW Public Law 106-65, "The National Defense Authorization Act of October 2000," (as known and referred to in this issuance as the National Defense Authorization Act of FY 2000), Congress granted CAP the authority to provide assistive technology, devices, and support services free of charge to federal agencies that have a partnership agreement with CAP. On October 17, 2006, the National Defense Authorization Act of FY 2000 provided the authority for members of the armed forces who are provided assistive technology by CAP to retain the technology upon separation from active service.

b. CAP's mission is to ensure that people with disabilities and wounded Service members have equal access to the information environment and opportunities in the DoD and throughout the Federal Government. By fulfilling this mission of providing real solutions for real needs, CAP is helping to make the Federal Government the model employer for people with disabilities.

Much of CAP's success lies in its ability to provide RAs to employees quickly and easily, increasing employment and retention of employees with disabilities.

c. CAP services are used by the Agency to ensure that the latest technologies are given to DCMA employees in need of assistive technologies. In addition, periodic audits are performed on the technologies that are issued with the direction of the CAP program to ensure they are up to date with the latest improvements to assistive technologies. More information can be found on the CAP website.

3.6. EXCEPTIONS.

a. All ICT products or services developed, procured, maintained, or used by federal agencies that provide direct services to the public or to federal employees will be accessible to people with disabilities, unless a formal request for an exception from an established Section 508 standard is granted as an approved exception IAW established DCMA procedures and the Section 508 Coordinator.

b. Any task or delivery order issued for non-compliant items must meet an applicable exception. The FAR considers the following ICT as exceptions—

(1) ICT for a national security system defined as any information and communication 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. Systems which are critical to the direct fulfillment of military or intelligence missions do not include a system that is to be used for routine administrative and business applications (including payroll, finance, logistics, and personnel management applications);

(2) ICT acquired by a contractor incidental to a contract. That is, the products a contractor develops, procures, maintains, or uses, which are not specified as part of a contract with a federal agency, are not required to comply with this part. For example, a consulting firm that enters into a contract with a federal agency to produce a report is not required to procure accessible computers and word processing software to produce the report regardless of whether those products were used exclusively for the government contract or used on both government and non-government related activities since the purpose of the contract was to procure a report. Similarly, if a firm is contracted to develop a website for a federal agency, the websites created must be fully compliant with this part, but the firm's own website would not be covered. No substantive comments were received, and no changes have been made to this section in the final rule;

(3) If ICT conforming to one or more requirements in the Revised 508 Standards is not commercially available, the agency must procure the ICT that best meets the Revised 508 Standards consistent with the agency's business needs;

(4) ICT that complies with an earlier standard issued pursuant to Section 508 of the Rehabilitation Act of 1973, as amended (as republished in Appendix D), and that has not been altered on or after January 18, 2018, must not be required to be modified to conform to the Revised 508 Standards;

(5) ICT located in spaces frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment;

(6) ICT covered under the Access Board, Safe Harbor ruling IAW the ICT Standards and Guidelines, and;

(7) ICT that would impose an undue burden on the Agency.

(a) Basis. In determining whether compliance with all or part of the applicable accessibility standards in Part 1194 of Title 36, CFR would be an undue burden, an agency must consider:

1. The difficulty or expense of compliance.

2. All agency resources available to its program or component for which the ICT is being developed, procured, maintained, or used.

3. For each provision of Part 1194 of Title 36, CFR, that an agency finds to be an undue burden, the Requiring Official (Purchase Requester) must explain why, and to what extent, compliance with each such provision creates an undue burden. A thorough, rational explanation is required. Relevant attachments are encouraged.

(b) Documentation.

1. When acquiring commercial items, an undue burden determination is not required to address individual standards that cannot be met with supplies or service available in the commercial marketplace in time to meet the agency delivery requirements.

2. The Requiring Official must document in writing the basis for an undue burden decision and provide the documentation to the Agency 508 Coordinator, CIO, and DCMA Commander for review and approval. The document will then be submitted to the KO for review, approval, and processing.

3.7. SAFE HARBOR.

a. Unaltered, existing ICT including content which complies with the existing (December 2000) 508 Standards does not need to be modified or upgraded to conform to the Revised Section 508 Standards.

b. Safe Harbor applies only on an element-by-element basis meaning that each component or portion of existing ICT is assessed separately. For example, if the footer is updated on a page which violates the color contrast standards in the new standards and the footer is visible on every

page, only the footer must be updated to conform to the new standards rather than all of the pages.

3.8. UNDUE BURDEN.

a. When developing, procuring, maintaining, or using ICT, it is mandated per Section 508 Subpart A and B, that each agency will ensure that all the products comply with applicable provisions, unless an undue burden would be imposed on the agency. In this context, “undue burden” is a legal term that means “significant difficulty or expense.” In making an undue burden determination, agencies must consider all agency resources available to the program or component for which the ICT is developed, procured, maintained, or used-- not simply the cost.

b. DCMA is required by federal regulation Part 1194 of Title 36, CFR, to document and explain why, and to what extent, compliance with each such provision creates an undue burden. In addition, the exception documentation must contain a plan for providing individuals with disabilities with the information and data involved by an alternative means of access.

c. Even if an exception applies, DCMA still has obligations under Section 501 and Section 504 of the Rehabilitation Act. These sections require, among other things, that DCMA provide reasonable accommodation and alternative methods of access to the information for employees with disabilities and provide program access to members of the public with disabilities if the undue burden or commercial non-availability exceptions apply. Alternative means of access focuses on the provision of the information and data in an accessible manner--as opposed to the accessibility of the product itself. Alternative means may include, but are not limited to, TTY, qualified sign language interpreters, internet posting, captioning, text-to-speech, readers, or audio descriptions.

d. An exception may be granted if:

(1) A compliant product or service (if it is a commercial item) is not available.

(2) Meeting the applicable provisions would require DCMA to alter its requirements to the point where the procured ICT would not meet the agency’s needs.

e. Procurement.

(1) When acquiring commercial items, an undue burden determination is not required to address individual standards that cannot be met with supplies or services available in the commercial marketplace in time to meet the agency delivery requirements. If no product is commercially available that meets both agency requirements and the requirements of Section 508, “agencies cannot claim a product as a whole is not commercially available because no product in the marketplace meets all the standards.”

(2) If products are commercially available that meet some, but not all of the standards, the agency must procure the product that best meets the standards. Under these circumstances, the agency must consider both the core business requirements for the procurement and also the

extent to which the product or products under consideration meet Section 508 accessibility standards. The product or service that “best meets the standards” could be categorized as commercially not available since it did not meet all of the standards. If the product or service that is being acquired is less compliant with the Section 508 accessibility standards than other products available in the commercial marketplace, it would have to be documented that it is an undue burden to purchase the more compliant product or service.

(3) In order for an acquisition to qualify for a “commercial non-availability” exception, a description of the extent and how market research was performed must be documented. Details of the subsequent findings to locate a commercially available item, which concluded in the determination that a compliant product or service was not available, also must be documented.

3.9. EQUIVALENT FACILITATION.

a. The Access Board recognized that products could be available that do not meet the Section 508 Subpart B standards but use of an alternative design or technology that results in substantially equivalent or greater accessibility and usability by individuals with disabilities than would be provided by conformance to one or more of the requirements in Chapters 4 and 5 of the Revised Section 508 Standards is permitted. The functional performance criteria in Chapter 3 must be used to determine whether substantially equivalent or greater accessibility and usability is provided to individuals with disabilities. This is referred to as “equivalent facilitation.”

b. In the preamble to Section 508, the Access Board elaborates that this provision does not constitute a “waiver” or “variance” from the requirement to provide accessibility, but recognizes that future technologies may be developed, or existing technologies could be used in a particular way that could provide the same functional access in ways not foreseen by these standards. The Board stressed that, in evaluating whether a technology results in “substantially equivalent or greater access,” it is the functional outcome, not the form, which is important. The Board offered as one example an information kiosk which is not accessible to a person who is blind might be made accessible by having a telephone handset that connects to a computer that responds to touch-tone commands and delivers the same information audibly. Other examples could include the use of voice recognition and activation as potentially reasonable substitutes for some or all keyboard input functions. In effect, compliance with the functional performance criteria is the test for equivalent facilitation.

c. Recognizing the concept of equivalent facilitation, solicitations for ICT must be drafted with provisions that products offering equivalent facilitation are considered along with those that strictly meet the technical provisions.

3.10. COMMERCIAL AVAILABILITY OF PRODUCTS.

a. As required by the FAR final rule, when acquiring commercial items, an agency must comply with those accessibility standards which can be met with products or services which are available in the commercial marketplace in time to meet the agency's delivery requirements.

b. The Requiring Official must document individual provisions that cannot be met due to non-availability, with a copy to the contract file. If products are available that meet some, but not all applicable standards, agencies cannot claim a product as a whole is non-available just because it does not meet all of the standards.

3.11. AGENCY REPORTING REQUIREMENTS.

a. Section 508 requires the U.S. Attorney General to report every 2 years to the President and Congress on the state of federal department and agency compliance with the requirements of Section 508, including actions regarding individual complaints under the law.

b. Section 508 also requires each head of a federal department or agency to provide to the Attorney General such information as the Attorney General determines is necessary to conduct biannual evaluations.

c. DCMA Section 508 Staff members will comply with the compliance report IAW DoD Manual 8400.01-M.

d. DCMA Section 508 Contracting team provides and delivers the report to the DCMA Program Manager and IT system owners for corrections.

3.12. OTHER RELATED SECTIONS OF THE REHABILITATION ACT.

a. Section 501, "Employment of Persons with Disabilities." Section 501 prohibits discrimination on the basis of disability in federal employment and requires federal agencies to establish affirmative action plans for the hiring, placement, and advancement of people with disabilities in federal employment.

b. Section 504, "Nondiscrimination under Federal Grants and Programs." Section 504 prohibits discrimination based on disability in federally funded and federally conducted programs or activities in the United States, including employment programs.

c. Section 505, "Remedies and Attorney's Fees." Section 505 provides that the remedies, rights, and procedures set forth in the Civil Rights Act of 1964 must be available to any person alleging a violation of Section 504.

SECTION 4: POLICIES AND PROCEDURES

4.1. SECTION 508 RESPONSIBILITY/TRAINING.

a. Each DCMA employee listed in Section 2 of this document will be properly trained by the DCMA Section 508 PMO regarding the requirements of Section 508 and are responsible for compliance with the mandates of Section 508 to make the Agency's ICT information accessible to individuals with disabilities. This means that DCMA employees must take proactive steps to ensure that all ICT and all new or revised information made available on the Internet and/or the DCMA intranet meet all applicable technical provisions from the Section 508 accessibility standards prescribed by the Access Board, unless an exception is otherwise granted. DCMA employees must also take proactive steps to ensure that used, maintained, procured, acquired, or developed ICT products and services provide comparable access to individuals with disabilities.

b. At a minimum, all current and new DCMA employees are encouraged to complete basic Section 508 training coordinated by Section 508 Program Office on an annual basis to ensure that all DCMA employees have a general awareness and understanding of the Section 508 requirements and their implications. In addition, all DCMA managers and other DCMA employees performing in roles, or changing to jobs that require performance in roles, that are pertinent to the Section 508 provisions must also complete specialized Section 508 training as prescribed by DCMA. Training material will be made available on the DCMA DoD365-J site. More specific information regarding training is located on the Resource Page.

c. All DCMA Directorate(s) and Regions will receive Section 508 Program Office Fielding Support. Fielding Support consists of briefing Senior Leadership on how to prepare for Section 508 Fielding activities, conducting training with identified personnel from the directorate(s), identifying organizational Section 508 ICT requirements, assisting with remediation of their electronic content (where applicable), and reviewing their credit cards and procurement ICT packages.

(1) The Section 508 Program Office conducts an after-action review, assesses the results, and provides a comprehensive accessibility audit of organizational ICT requirements according to the best practices to Senior Leadership.

(2) The written report is to identify Section 508 defects, non-compliant ICT user impacts, and strategies for remediation. To assist content authors, software and website developers, and other creators in producing compliant content, trainings and tools will be provided.

(3) The progress of compliance fielding depends upon the timely response from each directorate point of contact to initiate fielding tasks.

4.2. DEPARTMENTAL SECTION 508 POLICIES AND PROCEDURES.

a. DCMA has established Agency-wide procedures relating to the implementation of Section 508. While all of these references can be located in their respective places on the intranet, etc.,

this section references these regulations and advisories in a convenient reference within one document. As these regulations and advisories are updated on the intranet, these references/links will also be updated.

b. Policy and Procedure for Acquisition of ICT (Procurement). Acquisition/Procurement Process. Section 508 is implemented through FAR requirements on the federal acquisition of ICT. Section 508 acquisition/procurement process is located on the Resource Page.

(1) Need.

(a) The customer and/or the requirements (program) office must read the Section 508 Standards and determine which technical provisions apply.

(b) Section 508 Applicability is about determining whether Section 508 applies to any specific procurement. Section 508 is applicable to a procurement, if any deliverables:

1. Meet the definition of ICT as defined by the Access Board Standard, and
2. Do not meet the criteria of a general exception.
3. Common examples of ICT include:
 - a. Software or operating systems (e.g., word processing application, accounting software, authoring and document presentation tools).
 - b. Desktop or portable computer (e.g., laptops, tablets).
 - c. Electronic office products (e.g., photocopiers, calculators, fax machines, printers).
 - d. Telecommunication products (e.g., telephones, cell phones).
 - e. Video and multimedia products (e.g., televisions, videotaped productions).
 - f. Websites.

4. Section 508 is relevant to all ICT procurements. Simply put, this means any products or services used in the creation, conversion, or duplication of data or information may be subject to Section 508 requirements. ICT deliverables are evident in many procurements, for example, a laptop computer, an all-purpose machine, a website, etc. Each of these deliverables must be treated individually in subsequent steps of the Section 508 compliance process.

(c) Requirement. DCMA requires that all Requiring Officials submit a Section 508 Determinations and Findings Form (D&F) and GSA ART requirements to the agency Section 508 Coordinator for review and approval for all ICT products and services procurements. ICT hardware and/or software procurement packages are required to include applicable Section 508

procurement language using the GSA ART and include the language in the requirement document, PWS, SOW, or SOO. If the ICT is a service, then a PWS, SOW, SOO is required along with the Section 508 D&F Form. If the ICT Inventory is a hardware or software only the requirement document must be included with the Section 508 D&F Form. The Section 508 D&F Form requires the Requiring Official to provide relevant information relating to the type of ICT contained within the procurement, provide the products and/or services delivered under the acquisition, include what if any Section 508 exceptions may apply, include if it is a COTS product as defined by the FAR, provide applicable compiled technical standards, market place availability, and the capability of meeting the Agency's delivery requirements.

(d) When submitting a waiver for Undue Burden exception or Commercial Non-Availability exception, the Requiring Official is required to complete and attach the corresponding exception form to the Section 508 D&F Form. The exception form must include an action memo which is reviewed by the Agency CIO and Director for approval.

(e) Market Research.

1. The customer and/or the Requiring Official must perform market research to determine the availability of products and services that meet the applicable technical provisions. In determining availability, the customer or the Requiring Official should consider, among other things, information on vendor websites and the government's Section 508 websites.

2. Technical specifications and minimum requirements must be developed considering the results of market research and DCMA needs. The customer and/or the Requiring Official must submit this information along with the purchase request, including non-availability or undue burden documentation as appropriate, to the KO. The results from market research must also be maintained in the contract or purchase documentation files for all ICT procurements.

3. Market research must be performed IAW established DCMA procedures for each ICT acquisition to determine the availability of products and services that meet the applicable technical provisions. DCMA will use the established procedures to conduct its market research. In determining availability, consideration will be given to information on vendor websites and the Government's Section 508 website.

4. An ICT item is commercially available if it meets any one of the following criteria:

a. It is for sale in the common marketplace.

b. It will be on the market in time to satisfy the solicitation.

c. With minor modification, the item could be available in time to satisfy the solicitation.

5. Where no products in the commercial marketplace meet all of the technical provisions, the Access Board's standards require DCMA to "procure the product that best meets the standards." This may be the product that meets the most applicable technical provisions, but alternatively could be one that meets fewer technical provisions, but which better addresses the accessibility needs of the intended end users.

(f) Solicitation.

1. The KO must draft and issue a solicitation to receive offers from interested sources or consider placing an order under a delivery order or task order contract-standard language is not an option. Proposal evaluation may yield additional information that could require reconsideration of the need for an exception (either retracting or invoking an exception, such as non-availability). An agency must consider ICT that offers equivalent facilitation and should state in its solicitation that it will do so.

2. Solicitation language should include Program Need, Deliverable Requirements, Evaluation and Acceptance Factors, and a Government Product/Service Accessibility Template (GPAT) which identifies the applicable Section 508 provisions. The "Quick Links" button in the ART, developed by General Service Administration, should be used to generate solicitation language and the GPAT. The solicitation language requires vendors to fill out the GPAT to let you know how well their product and service meets these requirements.

(g) Post Solicitation. If Section 508 requirements were included in the solicitation, procurement officials/staff need to evaluate the received proposals using those requirements.

(h) Exceptions for Procured Products/Services (Undue Burden and Commercial Non-Availability). There are exceptions to the Section 508 ICT Accessibility Standards. For a complete list of exceptions, please review Paragraph 1194.3, of the Section 508 ICT Accessibility Standards. Exceptions must be documented in writing and approved in writing by the DCMA Section 508 Coordinator.

(i) Undue Burden.

1. An undue burden is a significant difficulty or expense incurred due to an alteration of policy, procedure, or product. In determining whether selecting or developing an ICT that meets the Section 508 Standards would impose an undue burden, DCMA will consider all the resources available to the program or component for which the ICT is being developed, procured, maintained, or used. The Undue Burden Exception requires a high threshold for avoiding compliance and requires something more than minor inconvenience or increased expense. Compliance with the Section 508 Standards is not an undue burden merely because compliance would be more expensive than non-compliance. Only in extraordinarily exceptional cases is it likely that costs will be found to be so significant that DCMA is relieved from Section 508 compliance.

2. Even when meeting the Section 508 Standards would impose an undue burden on DCMA, Section 508 requires that the information and data to be provided by the ICT be

provided to individuals with disabilities by an alternative means of access. Alternative means of access focuses on the provision of the information and data in an accessible manner, as opposed to the accessibility of the product itself.

3. The following informal procedures can help officials properly document why the procurement of ICT that complies with Section 508 poses an “undue burden” for the agency:

a. Follow the current guidance on acquisition planning and market research. Documentation of the determination is essential.

b. Document the market research, the levels of compliance each product or service provides, costs of each product or service, and methodology of installing each product or service. If it is determined that complying with Section 508 would adversely affect our agency because of a significant expense, document this as well, including an estimate of the cost that would be incurred, and the relationship between this cost and the overall resources available.

c. Ensure project or program manager is heavily involved.

d. Involve DCMA section 508 Coordinator in an advisory capacity and to provide clarity.

e. Involve the Agency CIO.

f. Involve a DCMA GC representative for legal interpretations and to advise on actions.

g. Involve the EEO Office for Section 504 compliance issues when a procurement will not meet Section 508 requirements and an undue burden is claimed.

h. Ensure that documents support the claim.

i. Notify the CIO, Section 508 Coordinator, EEO, and GC of a final Undue Burden determination.

(j) Commercial Non-Availability determinations must be based on market research. If products are available that meet some, but not all, applicable Section 508 Standards, you cannot claim a product as a whole is not commercially available just because it does not meet all of the applicable Section 508 Standards. If products are commercially available that meet some, but not all of the Section 508 Standards, then DCMA must use the product that best meets the Section 508 Standards and DCMA’s specified business needs. Commercial Non-availability determinations must be documented in writing. The Requiring Official must document individual provisions that cannot be met due to non-availability, with a copy to the contract file.

(k) Procedures for the Development of Software/Applications.

1. Software and web application developers must ensure that Section 508 and accessibility requirements are built into the early phases of life-cycle development to avoid the time and cost of retrofitting. These requirements should be built into the contracts and deliverable SOW, PWS, SOO and requirements documents. If an application or part of an application cannot be made Section 508 compliant, it should be well documented which standard the product does not conform to and why. Alternative access should also be made available.

2. Developers and Certified Section 508 Validators are also responsible for testing products to ensure they are Section 508 compliant per the guidelines in the Application Accessibility Guidelines and Testing Procedures.

(2) Exceptions for Developed ICT.

(a) The same procedures outlined under procurement above can be used for internal in-house developed or maintained ICT.

(b) All requests for a Section 508 exception must be made and processed IAW the law and DCMA procedures as described. Each case must be formally reviewed and approved by the Section 508 Program Officer and Section 508 Program Staff. Each approved undue burden exception will require annual review by the Section 508 Coordinator.

(c) If an exception is granted for an ICT product or service procurement, the appropriate exception documentation must be maintained in the applicable contract or purchase documentation file. All documented exceptions to Section 508, including non-availability determinations, must be tracked for future reporting to the DCMA and DOJ. If you believe that the system or application procured or developed is eligible for exception, fill out the undue burden certificate and send to Section 508 Coordinator.

(d) To claim an undue burden on legacy applications or applications in development (see “Procedures for Undue Burden Determination” on the Resource Page).

c. Enforcement and Complaint Procedures.

(1) RA.

(a) Section 508 provides the framework for establishing an accessible work environment that allows for seamless use of assistive technology and related software. Section 501/Section 504 provides the RAs to applicants and employees with disabilities.

(b) The EEO Office established an administrative complaint process, providing that “any individual with a disability may file a complaint alleging that a federal department or Agency fails to comply with providing electronic and information technology.” The law specified that complaints are to apply the complaint procedures established under Section 504 for resolving allegations of discrimination in a federally conducted program or activity. Individuals may also file a civil action against an Agency.

(c) DCMA policy is to make RA to the known physical or mental limitations of qualified applicants for employment and employees with disabilities unless such an accommodation would impose an undue hardship on the operation of the Department's activities and/or programs IAW DoD Manual 8400.01-M.

(d) EEO is responsible for the RA program. An applicant or employee may request an RA orally, or at any time in writing. The request does not require the individual to mention the Rehabilitation Act or use the phrase “reasonable accommodation” or “disability.” However, a RA Request Form (refer to Section 1-1) must be completed by either the employee or the supervisor (see Appendix B of the Equal Employment Opportunity Reasonable Accommodation Guidance). The RA form and written procedures must be provided to applicants and employees in an accessible format that meets an individual’s particular need, including written Braille, large print, etc. The RA process begins as soon as an individual makes an oral or written request for accommodation to the immediate supervisor, a supervisor or manager in the individual’s chain of command, the Total Force Directorate, the EEO Office, or the Disability Program Manager. All requests for RA including, but not limited to, request for hardware, software, and specialized installations must be formally documented and archived according to established DCMA procedures. For more information, please see the RA form.

(2) EEO Complaint Process. If any DCMA employee, former employee, or applicant for employment believes that he/she has been discriminated against because of race, color, religion, sex, national origin, age (40 and over), physical or mental disability or reprisal (for engaging in previous EEO protected activity) in an employment matter subject to the control of the Agency, he/she may file an EEO complaint. For more information on the EEO complaint process or other EEO related items, visit the EEO intranet page. If the complaint deals with accessibility of a DCMA application, system, and/or document, please follow the procedures listed in Section 508 Complaint Process.

(3) Section 508 Complaint Process.

(a) Section 508 established an administrative complaint process, providing that any individual may file a complaint alleging that DCMA does not comply with the law in providing access to and use of information and data through ICT that is comparable to the access to and use of information and data that is available to individuals who are not disabled. All complaints regarding an individual’s inability to obtain access to DCMA information and data through its ICT must be made and processed in an orderly and prompt manner IAW established DCMA procedures. The law specified that the federal department or agency receiving the complaint must apply the complaint procedures established under Section 504 for resolving allegations of discrimination in a federally conducted program or activity. Individuals may also file a civil action against an agency. The civil action process is detailed on the Resource Page.

(b) In addition to the formal complaint process, DCMA must establish alternatives to increase communication from appropriate parties while procuring, developing, and deploying ICT. Full use of these methods is likely to decrease the need for formal dispute resolution. These informal channels must be exercised first, prior to filing a formal complaint, so DCMA

has the opportunity to solve the problem. The formal complaint process is located on the Resource Page.

(4) Web-Based Intranet and Internet Information and Applications Accessibility Policy.

(a) Web Accessibility Policy for Intranet and Internet Pages. DCMA has adopted a policy to make its websites accessible to all DCMA customers and employees, and agencies and mission areas have announced this policy through a link on home pages. All of the Agency's websites undergo consistent review and redesign as necessary to ensure that they meet or exceed the requirements of Section 508 of the Rehabilitation Act of 1973. Many of our websites currently meet the Section 508 accessibility standards. Furthermore, DCMA continues to work on making all websites accessible.

(b) DoD/DCMA Accessibility statement: "The DoD is committed to making its electronic and information technologies accessible to individuals with disabilities IAW Section 794d of Title 29, U.S.C., and Section 508 of the Rehabilitation Act of 1973. For persons with disabilities experiencing difficulties accessing content on a particular website, please use the link to the DoD Section 508 Form, "DoD Section 508 Issues, Complaints and Concerns Form," located on the Resource Page. On this form, indicate the nature of your accessibility issue/problem and your contact information so that your issue or question can be addressed."

d. Accessibility Policy for Public Documents.

(1) Assuring accessibility of public documents to all individuals is one of the cornerstones of our form of government. Document accessibility policies should be clearly stated on home pages and on pages listing document resources. DCMA is committed to making all of our documents on our World Wide Web servers accessible to everyone. DCMA is continually reviewing our websites and updating pages to ensure that they meet or exceed the requirements of Section 508 of the Rehabilitation Act of 1973.

(2) If you have difficulty accessing one of our webpages or documents while using assistive technology, or if you have suggestions for how we may improve accessibility, please contact the page's Site Manager/Webmaster or the Section 508 Coordinator.

e. Policy for Accessibility of Web Content and Documents for Employees.

(1) Differences between Document Accessibility for External Publics and DCMA Employees. Since there is little control over the assistive devices and the applications software in use by the public, accessibility can best be provided through hypertext markup language, text, and, portable document format documents. However, for internal audiences (employees), where known assistive technologies are in use, word processing documents, spreadsheets, and Rich Text Format formatted outlines of Microsoft PowerPoint presentations are significantly more accessible with their assistive technologies.

(2) DCMA employees that develop and/or maintain web content and electronic content/documents will make intranet websites, webpages, electronic content/documents, and

information equally accessible to all employees, including employees with disabilities. All electronic content that is public facing and/or an agency official communication is required to be Section 508 compliant. DCMA performs reviews to ensure the accessibility of intranet websites and webpages meet or exceed the requirements of Section 508 of the Rehabilitation Act of 1973 and to remove accessibility problems. This review includes documents and publications distributed for general use within DCMA for employees, as well as DCMA's departmental regulations, notices, manuals, Secretary's memoranda, and the content of emails distributed to employees. We encourage employees who find accessibility issues with intranet pages to email their DCMA DoD365-JSite Manager or Section 508 Coordinator. All Section 508 Internal Control Programs Process diagrams listed below are located on the Resource Page of this manual provide instructions for both employee (requires Manager review) and Manager level (Does Not require Manager review) positions.

(a) DCMA 508 Preventative Strategy for Agency-Wide 508 Compliant Documents Process.

(b) DCMA 508 Preventative Strategy for Agency-Wide 508 Compliant Documents Process Fielding.

(c) DCMA 508 Patch Version Upgrade Process.

(d) DCMA 508 Acquisitions Process.

(e) DCMA 508 Customer and PMO Document Remediation Process.

(f) DCMA 508 Grievance and Compliant Process (External) Process.

(g) DCMA 508 Grievance and Compliant Process (Internal) Process.

(h) DCMA 508 New Hardware Installation Process.

(i) DCMA 508 New Hardware with Cloud Access/Flash Media/Bluetooth Installation.

(j) DCMA 508 New Software Installation Process.

(k) DCMA 508 Virtual Instructional Led Training Process.

(l) DCMA 508 Whitelist Addition New Hardware Process.

(m) DCMA 508 Whitelist Addition New Software Process.

(n) DCMA 508 Compliance Testing and Remediation Process.

SECTION 5: PERFORMANCE MEASURES

Performance measures should be focused on the goals to be achieved in ensuring Section 508 compliance and accessibility of ICT. To measure performance, these goals need to be translated into measurable elements by which performance can be gauged.

a. The following types of performance measures can be used as a starting point for a more comprehensive set of Section 508 performance measures to be used in the Agency:

- (1) Reaffirm Section 508 responsibility in individual performance elements.
- (2) Compliance for DCMA Public and DCMA careers for the individuals with disabilities.
- (3) Top intranet sites in current fiscal year and level of compliance for each.
- (4) The extent to which applicable Section 508 technical provisions are included in SOW, task orders, and contracts.
- (5) Compliance with training requirements (i.e., number trained).
- (6) Undue burden requests – approved and denied.

b. In addition to being useful for internal performance reviews, many of these same performance measures may also be used in biennial reporting to the DOJ on DCMA's Section 508 compliance.

SECTION 6: GUIDELINES FOR REQUIRING OFFICIALS

6.1. INTRODUCTION. The FAR sets out requirements for requesting/Requiring Officials to document their acquisitions through documented market research, and written substantiation for the conformance of products or services with Section 508 Standards, or fully documenting the lack of commercial availability, or the existence of an undue burden in conforming to Section 508 Standards. Paragraph 6.2., describes the information to help facilitate this documentation, and can be used to document the acquisition, in conjunction with other required documentation as specified in procurement policies.

6.2. DOCUMENTING CONFORMANCE WITH SECTION 508 STANDARDS. The following information must be captured for the ICT acquisition request in order to assure highest level of the Section 508 conformance:

- a. Name of Reviewer/Approving Official (include Agency or mission area, mailing address, email address, telephone number).
- b. Description of the ICT to be acquired or developed (include name, source, version number(s), and category of product or service, and if applicable, include a copy of the ACRs/VPATs and other accessibility documents supplied by the vendor).
- c. Type of Acquisition (new purchase; new development; upgrade or modification to an existing product, order, service, or contract; custom developed software; commercial off-the-shelf software; Commercial Off the Shelf with modifications; services).
- d. Estimated total cost.
- e. Business purpose and core functions of the software/hardware/service. Include the type of ICT being acquired (e.g., software development tool, word processing, spreadsheet, database, message, group calendaring, etc.) and also the scope of usage (e.g., DCMA-wide, Agency only, mission area only, division or workgroup-level only, etc.).
- f. Identification as to whether the product or service will replace existing products or services.
- g. Description of the users of the product or service (employees, contractors, public? How many users are expected to use the product or service?)
- h. Explanation of technology requirements if the ICT will be used on the network and require network connections, or if it is a standalone product.
- i. Description of what testing has been performed to validate the accessibility of the product or service ACRs/VPATs or other vendor representations need to be validated, at least on a spot basis.
- j. Identification of website and software application test failures and findings within a report.

k. Detailed description as to why an ICT does not meet accessibility standards.

l. Results of investigation and documentation of the expected cost and length of time to determine if an ICT that does not meet accessibility standards can be made accessible.

m. Description of what alternatives to the product or service requested are available in the market that are more accessible, or fully accessible, if the ICT is not fully accessible (i.e., fully meeting Section 508 Standards for technology-specific and functional requirements). Include the following:

(1) A listing of all other products investigated during market research, with website references, ACRs/VPATs and other accessibility documentation.

(2) Specific description of the products including name, version number, category/type of product, source information such as address and contact name, and estimated prices, if available.

n. Attestation (and explanation) by the Requiring Official whether the ICT is the most accessible ICT in its category.

o. Proof of Commercial Non-Availability. If the ICT is not accessible (does not fully meet Section 508 Standards for technology-specific and functional requirements), and if alternatives to the product or service being requested which are available in the market are also not accessible, include the following:

(1) Explanation of what alternatives were researched and why they are not accessible.

(2) A listing of all other products investigated during market research with websites references, ACRs/VPATs and other accessibility documentation.

(3) Specific description of the products including name, version number, category/type of product, source information such as address and contact name, and estimated prices, if available.

p. Estimation of the cost in dollars and resources of making the ICT accessible and the cost of purchasing or developing an accessible alternative. If either of these is not possible, describe why this is not possible.

q. Explanation of why an exception is necessary for this ICT, which Section 508 or FAR exception applies, and how you are meeting the requirements for this exception.

r. Exception or determination decision claimed (undue burden, commercial non-availability, not specified in Section 508 (e.g., component parts), contractor use, etc.).

s. Detailed explanation (with supporting budget documents, as necessary) if claiming an “undue burden” why it would create an undue burden for the department, Agency, or mission area to make the ICT accessible or to use an accessible alternative.

t. Signed, dated (electronic/wet) checklist by the Requestor/Requiring Official verifying the submitter, as well as by the contracting officer/reviewer, and the approving official, as designated/delegated by the OCIO, DCMA. This documentation should become a permanent part of the acquisition file.

u. Results of a risk analysis need that was conducted by the Cybersecurity Center when the ICT acquisition is not on the DCMA approved software/hardware listing.

GLOSSARY

G.1. DEFINITIONS.

Access Board. The United States Access Board, formerly known as the Architectural and Transportation Barriers Compliance Board, is an independent federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards. Created in 1973 to ensure access to federally funded facilities, the Access Board is now a leading source of information on accessible design. The Access Board develops and maintains design criteria for the built environment, transit vehicles, information and communication technology, and medical diagnostic equipment under the Americans with Disabilities Act of 1990 and other laws. It also provides technical assistance and training on these requirements and on accessible design and continues to enforce accessibility standards that apply to federally funded facilities under the Architectural Barriers Act of 1968. The Access Board is structured to function as a coordinating body among federal agencies and directly represent the public, particularly people with disabilities. Its governing board is a 25-member board. Twelve of its governing board members are representatives from most of the federal departments. Thirteen others, who are appointed by the President, are members of the public, and most of them must have a disability. The Access Board also employs approximately thirty staff across four units: Office of Executive Director, Office of Administration, Office of General Counsel, and Office of Technical and Information Services. (The glossary terms, below, are included in the “Definitions” section of Part 1194, of Title 36, (CFR). “Information and Communication Technology Accessibility Standards,” published in the Federal Register on December 21, 2000, by the Architectural and Transportation Barriers Compliance Board. Pursuant to Part 1194 of Title 36, CFR, Information and Communication Technology Accessibility Standards.

Accessible. Defined as “conforming to the provisions of the Information and Communication Technology Accessibility Standards, published by the Architectural and Transportation Barriers Compliance Board.

ACR. The ACR is a representation of how the product meets the applicable Section 508 Technical Standards.

ART. The ART is a step-by-step guide to help you easily identify relevant accessibility requirements from the Revised Section 508 Standards, and incorporate them into your procurement and contracting documentation, as well as in-house IT development.

Agency. Any Federal department or agency, including the United States Postal Service.

Agency Official Communication. Content that constitutes official business and is communicated by an agency through one or more of the following: an emergency notification; an initial or final decision adjudicating an administrative claim or proceeding; an internal or external program or policy announcement; a notice of benefits, program eligibility, employment opportunity, or personnel action; a formal acknowledgement of receipt; a survey questionnaire; a template or form; an educational or training material; or intranet content designed as a webpage.

EXCEPTION: Records maintained by the National Archives and Records Administration pursuant to Federal recordkeeping Federal Regulations must not be required to conform to the Revised 508 Standards unless public facing.

Alternate Formats. Alternate formats usable by people with disabilities may include, but are not limited to, Braille (hard copy and refreshable braille displays), American Standard Code for Information Interchange text, large print, recorded audio, and electronic formats that comply with this part.

Alternate Methods. Different means of providing information, including product documentation, to people with disabilities. Alternate methods may include, but are not limited to, voice, fax, relay service, TTY, internet posting, captioning, text-to-speech synthesis, and audio description.

Assistive Technology. Any item, piece of equipment, or system, whether acquired commercially, modified, or customized, that is commonly used to increase, maintain, or improve functional capabilities of individuals with disabilities.

Electronic Content. A wide set of differently encoded information and is not restricted to “web” or “documents” only. Electronic content includes “electronic information and data, as well as the encoding that defines its structure, presentation, and interactions.” Electronic content includes webpages, electronic documents, and both Web and native software applications.

ICT. Includes IT 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 ICT includes, but is not limited to, telecommunications products (such as telephones), information kiosks and transaction machines, Worldwide Websites, multimedia, and office equipment such as copiers and fax machines. 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, heating ventilation and air conditioning equipment such as thermostats or temperature control devices, and medical equipment where IT is integral to its operation, are not IT.

IT. Any equipment or interconnected system or subsystem of equipment, that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. The term information technology includes computers, ancillary equipment, software, hardware and similar procedures, services (including support services), and related resources.

Managers’ Internal Control Program. A procedure established to review, assess, and report on the effectiveness of internal control programs in DCMA.

Operable Controls. A component of a product that requires physical contact for normal operation. Operable controls include, but are not limited to, mechanically operated controls, input and output trays, card slots, keyboards, or keypads.

Product. ICT.

Public Facing Content. Content made available by an agency to members of the general public. Usually, public facing content is published on the web (for example, on an agency website, blog, form, or social media page). However, public facing content might also be made available in non-web formats, such as information displayed on screens or interactive kiosks in waiting areas.

Requiring Official. Federal personnel who generate the request for or specifies the information and communication technology product or service to be acquired, developed, or maintained.

Section 501 of the Rehabilitation Act of 1973. As amended, prohibits discrimination on the basis of disability in Federal employment and requires Federal agencies to establish affirmative action plans for the hiring, placement, and advancement of people with disabilities in Federal employment.

Section 504 of the Rehabilitation Act of 1973. As amended, prohibits discrimination based on disability in federally funded and federally conducted programs or activities in the United States, including employment programs. This involves, but is not limited to, providing individual accommodation at the worksite using assistive technologies.

Section 505 of the Rehabilitation Act of 1973. States that Remedies and Attorney's Fees. Section 505 provides that the remedies, rights, and procedures set forth in the Civil Rights Act of 1964 must be available to any person alleging a violation of Section 504.

Telecommunications. The transmission, between or among points specified by the user, of information of the user's choosing, without change in the form or content of the information as sent and received.

TTY. Abbreviation for teletypewriter machinery or equipment that employs interactive text-based communications through the transmission of coded signals across the telephone network. TTYs may include, for example, devices known as telecommunication display devices or telecommunication devices for deaf persons or computers with special modems. TTYs are also called text telephones.

Undue Burden. Undue burden means significant difficulty or expense.

WCAG. The WCAG are technical standards on web accessibility developed by the W3C). The guidelines represent a shared, international standard developed by many different stakeholders, including industry, disability organizations, government, and accessibility research organizations. WCAG isn't a legal requirement, but a set of globally adopted standards. The guidelines aim to make websites, apps, electronic documents, and other digital assets accessible to people with a broad range of disabilities, including sensory, intellectual, learning, and physical disabilities.

GLOSSARY

G.2. ACRONYMS.

ACR	Accessibility Conformance Report
ART	Accessibility Requirements Tool
CAP	Computer/Electronic Accommodations Program
CFR	Code of Federal Regulations
CIO	Chief Information Officer
DoD	Department of Defense
DOJ	Department of Justice
D&F	Determinations and Findings
EEO	Equal Employment Opportunity
FAR	Federal Acquisition Regulation
GC	General Counsel
GPAT	Government Product/Service Accessibility Template
GSA	General Services Administration
IAW	in accordance with
ICT	Information and Communications Technology
IT	Information Technology
KO	Contracting Officer
OCIO	Office of the Chief Information Officer
PMO	Program Management Office
PWS	Performance Work Statement
RA	reasonable accommodation
SOO	Statement of Objectives
SOW	Statement of Work
TTY	Teletypewriter
U.S.C.	United States Code
VPAT	Voluntary Product Accessibility Template
WCAG	Web Content Accessibility Guidelines

REFERENCES

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Code of Federal Regulations, Title 36, Part 1194
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Public Law 88-352, “The Civil Rights Act,” July 7, 1964
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