



DCMA Manual 4401-18

Information and Communication Accessibility Service

**Office of Primary
Responsibility**

Information Technology Capability

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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 (DoD IE)," (Paragraph K) 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 procedures

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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 are requested, unless higher-level regulations, policy, guidance, or agreements take precedence.

1.2. POLICY. It is DCMA policy to comply with following Access board rules and regulations:

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

b. Comply 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. Execute this Manual in a safe, efficient, effective, and ethical manner.

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 principal officer in the agency charged with managing the implementation of Section 508 information and communication 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. In collaboration with the Procurement Center (DCMA-AQPW), establish the requirements within the agency for acquiring ICT. The CIO's oversight includes both approving IT investments and monitoring and evaluating the performance of these investments. 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 that ICT is accessible to persons with disabilities.
 - (3) Develop a critical factor specifically related to accessibility in the capital planning and investment control process.
 - (4) Report to the DOJ on DCMA Section 508 compliance biennially.
- e. Work closely with Government agencies to ensure that ICT is accessible.

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

- a. Lead the agency's efforts to assemble a Section 508 Team and 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 resources that are available.
 - (1) 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. Be responsible for the following activities:

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

(2) Reviewing or assisting with all new purchase requests to ensure DCMA's compliance with Cybersecurity and the Risk Management Framework as required by DoD Instruction 8510.01, "Risk Management Framework (RMF) for DoD Information Technology," relative to Section 508.

(3) Supporting DCMA Section 508 Coordinators at the project level and Section 508 Clearance Officers in reviewing completed Voluntary Product Accessibility Templates (VPAT) 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) Reviewing and approving/certifying all DCMA Section 508 exception requests and recommending to the DCMA Section 508 Official the appropriate action(s) to be taken.

(5) Developing required reports and/or coordinating/completing required surveys on Section 508 exceptions and other Section 508 activities, and submitting the results to the DCMA Section 508 official for review.

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

(7) Providing technical assistance on Section 508 issues.

(8) Coordinating completion of the biennial DOJ Section 508 survey for DCMA input into the DCMA final report.

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

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

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

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

2.3. REQUIRING OFFICIAL(S) AND PROCUREMENT CONTRACTING OFFICER (PCO). Requiring Officials reside throughout DCMA and Contracting Officers (KO) are part of the Contracts Directorate that 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. Develop 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 in requirements as applicable for the ICT. Requirements can be found on the www.Section508.gov website.
- e. Ensure that undue burden 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.

(1) Specifically, Requiring Officials will:

(a) Be consistent with the FAR, the "Purchaser/Requestor" or "Requiring Official" -- the person who generates the request for or specifies ICT or service to be acquired, developed or maintained -- will ensure that the acquisition of ICT products and services meet the Section 508 ICT accessibility standards, unless an exception applies.

(b) 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). The market research stage is that 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.

(c) Identify which standards apply to the procurement.

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

(e) Draft technical specifications and minimum requirements to be submitted with the purchase request.

(2) KOs will:

(a) Review statements of work and purchase requests to ensure that 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 that 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 a VPAT or other statement).

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

3. If “significant difficulty or expense” causes the requestor/Requiring Official to determine that conforming to Section 508 Standards present 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.

2.4. SOFTWARE AND WEB APPLICATION DEVELOPER. The developers will:

a. Ensure they utilize 508 accessibility checklist during application development.

b. Ensure applications are planned and developed, in compliance with Section 508 ICT Accessibility Standards. Addressing accessibility requirements early in the development cycle can facilitate 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.

c. Use 508 Accessibility Checklist (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.

2.5. THE SECTION 508 COORDINATION TEAM. The Section 508 Coordination Team consists of Section 508 Advisory Board, Section 508 Program Staff members (federal and contractor functional subject matter experts), DCMA Information Managers, and DCMA 360 Site Managers. All groups, aside from those on the Advisory Board outside of IT, report to the

Office of the Chief Information Officer (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:

- Executive Director, Information Technology Directorate (DCMAIT)
- Executive Director, Contracts (DCMA-AQ)
- Director, Equal Employment Opportunity (EEO) Office (DCMA-DDO)
- Executive Director, Total Force (DCMA-TF)
- Executive Director/Director, Office of General Counsel (DCMA-GC)
- Director, Corporate Operations (DCMA-DC)
- Government Worker's Union

c. The Program Staff is composed of a team of 508 Accessibility functional subject matter experts and serve as an advisory board, the 508 Accessibility Team will:

(1) Develop a plan to identify needs for accessible systems and adaptive technology and identify IT deficiencies that impact performance of persons with disabilities in current and prospective IT systems.

(2) Develop a charter to further define roles and responsibilities of the ICT Accessibility Coordinators in their respective departments

(3) Respond to future DOJ Section 508 surveys.

(4) Advise DCMA of the requirement to integrate Section 508 into their IT capital plans, budget plans, and strategic plans.

(5) Participate in monitoring, measurement, and disclosure activities including usability testing and priority setting.

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

(7) Coordinate response to DOJ Section 508 surveys, aggregating results from Section 508 Coordinators.

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

(9) Recommend a policy on implementation and enforcement.

(10) Publicize 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) Provide opportunity for suggestions and feedback from DCMA internal and external customers, including persons with disabilities.

(12) Develop a webpage for information sharing on the OCIO intranet.

(13) Audit and remediate public websites.

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

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

(16) Coordinate compliance and remediation efforts of DCMA 360 Site Managers.

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

(1) Complete all required Section 508 training.

(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 component and collaborate with the DCMA Section 508 Coordinator to determine the appropriate action(s) to be taken.

(5) Review completed 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 communication 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 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.

(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 360 Site Managers will:

(1) Complete all required Section 508 training.

(2) Review electronic communication (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 Standards.

2.6. THE SECTION 508 CLEARANCE OFFICER: The Section 508 Clearance Officer will provide support by reviewing completed 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.

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

(1) Complete all required Section 508 training.

- (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 component and collaborate with the DCMA Section 508 Coordinator to determine the appropriate action(s) to be taken.
- (5) Review completed 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 communication 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 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.
- (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.

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 information technology to ICT. The revised version also includes a broad application of the Web Content Accessibility Guidelines 2.0 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. Section 508 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.

d. 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.

e. 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 ICT.

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 also include performance-based requirements that 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 also 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 that 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 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 that 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. The final FAR ruling for implementing the revised Section 508 Standards is still pending release.

b. For other than indefinite-quantity contracts, the FAR ruling applies to contracts awarded on or after June 25, 2001. For indefinite-quantity contracts, it is applicable to delivery orders or task orders issued on or after June 25, 2001, as well.

3.5. COMPUTER/ELECTRONIC ACCOMMODATIONS PROGRAM (CAP).

a. The Under Secretary of Defense for Personnel and Readiness established CAP in 1990 as the centrally funded reasonable accommodations 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 reasonable accommodations 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 to ensure they are up to date with the latest improvements to assistive technologies. More information can be found on the CAP website <https://www.cap.mil/>

3.6. EXCEPTIONS.

a. All ICT systems or products 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) For micro-purchases, KO and other individuals designated IAW Subpart 13.2, and Part 1.603-3, FAR are strongly encouraged to comply with the applicable accessibility standards to the maximum extent practicable;

(2) 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);

(3) 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;

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

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

(6) 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; and

2. Agency resources available to its program or component for which the supply or service is being acquired.

(b) Documentation.

1. The Requiring Official must document in writing the basis for an undue burden decision and provide the documentation to the contracting officer for inclusion in the contract file.

2. 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.

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 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 resources available to the program or component procuring or developing the ICT -- not simply the cost.

b. DCMA is required by statute 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, or

(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 yet incorporate designs or technologies that provide substantially equivalent or greater access to and use of a product for people 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 that can be met with supplies or services that 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 Attorney General to report every 2 years to the President and the 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, "Accessibility of Information and Communications Technology (ICT)."

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: PROCEDURES

4.1. SECTION 508 RESPONSIBILITY/TRAINING.

a. Each DCMA employee listed in Section 2 of this document is 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 acquired or developed ICT products and services provide comparable access to individuals with disabilities.

b. All DCMA employees listed in Section 2 of this document will be properly trained regarding the requirements of Section 508. At a minimum, all current and new DCMA employees must complete basic Section 508 training coordinated by program leads 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 360 Section 508 Program Office site referenced in the resource section of this document. More specific information regarding training can be found in Section 6.

4.2. DEPARTMENT SECTION 508 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 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. Section 508 is relevant to all ICT procurements. Simply put, this means any equipment 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 websites, etc. Each of these deliverables must be treated individually in subsequent steps of the Section 508 compliance process.

4. 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, etc.).

e. Video and multimedia products (e.g., televisions, videotaped productions).

f. Websites.

(c) Requirement. The customer and/or the Requiring Official must identify which technical provisions, if any, do not apply due to an exception, such as non-availability or undue burden. Once you determine that Section 508 is applicable to your procurement, the next step is to determine which technical and functional provisions apply to your product and/or service deliverables. If you are making a micro-purchase, under \$3,500, government purchase card procedures apply. This may be useful if you are making a small credit card purchase.

(d) 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.

(e) 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 Accessibility Template (GPAT) which identifies the applicable Section 508 provisions. The "Quick Links" button in the Buy Accessible Wizard, 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.

(f) Post Solicitation. If Section 508 requirements were included in the solicitation, procurement officials/staff need to evaluate the received proposals using those requirements. If the agency is buying a macro purchase, (i.e., IT valued above \$3,500), then entering the Buy Accessible Wizard via the "Enter Wizard" button and completing the necessary questions will produce an evaluation guide tailored for each product. The evaluation guide helps you track the applicable provisions and the commercial availability of each.

(g) 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 the Section 508 ICT Accessibility Standards, paragraph 1194.3. Exceptions must be documented in writing and approved in writing by the DCMA Section 508 Coordinator.

(h) 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 CIO, Section 508 Coordinator, EEO, and GC of a final Undue Burden determination.

(i) 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.

(j) 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 statement of work 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) Reasonable Accommodation.

(a) By law, Section 508 enforcement provisions apply only to ICT. Section 504 of the Rehabilitation Act requires access to federal programs for persons with disabilities, and both Sections 501 and 504 require 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.

(b) 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 reasonable accommodations to applicants and employees with disabilities.

(c) DCMA policy is to make reasonable accommodation 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 reasonable accommodation program. All requests for reasonable accommodation must be formally documented and archived according to established DCMA procedures. For more information, please see the reasonable accommodations 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. This process is located 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. This process is located on the Resource Page.

c. Web-Based Intranet and Internet Information and Applications Accessibility Policy.

(1) 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.

(2) 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."

e. 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 also 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.

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

(1) Differences between Document Accessibility for External or Public 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 than text or hypertext markup language documents.

(2) DCMA will make intranet websites, webpages, documents and information equally accessible to all employees, including employees with disabilities. 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 360 Site Manager or Section 508 Coordinator.

Note: Hardware and Software Acquisition Procedural workflows are provided in: Computer/Electronics Accommodations Program – Hardware Procedure and Computer/Electronics Accommodations Program – Software Procedure Process flow diagrams located on the Resource Page of this Manual and provide instructions for both employee (requires Manager review) and Manager level (Does Not require Manager review) positions.

SECTION 5: PERFORMANCE MEASURES

5.1. 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 statement of work, 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:

- Name of Reviewer/Approving Official (include agency or mission area, mailing address, email address, telephone number)
- 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 VPATs and other accessibility documents supplied by the vendor)
- 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)
- Estimated total cost
- 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.)
- Identification as to whether the product or service will replace existing products or services
- Description of the users of the product or service (employees, contractors, public? How many users are expected to use the product or service?)
- Explanation of technology requirements if the ICT will be used on the network and require network connections, or if it is a standalone product
- Description of what testing has been performed to validate the accessibility of the product or service (VPAT's or other vendor representations need to be validated, at least on a spot basis.) Include report of testing/validation
- Detailed description as to why an ICT does not meet accessibility standards

- 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
- 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:
 - A listing of all other products investigated during market research, with website references, VPATs and other accessibility documentation
 - 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
- Attestation (and explanation) by the Requiring Official whether the ICT is the most accessible ICT in its category
- 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:
 - Explanation of what alternatives were researched and why they are not accessible
 - A listing of all other products investigated during market research, with websites references, VPATs and other accessibility documentation
 - 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
- Estimate 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
- Explanation 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
- Exception or determination decision claimed (undue burden, commercial non-availability, not specified in Section 508 (e.g., component parts), back office exception, contractor use, etc.)
- 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
- 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

- 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.

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

Access Board. The Architectural and Transportation Barriers Compliance Board. (The glossary terms, below, are included in the “Definitions” section in Section 1194.4, “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, Title 36 CFR, Information and Communication Technology Accessibility Standards.

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

Alternate Formats. Alternate formats usable by people with disabilities may include, but are not limited to, Braille, American Standard Code for Information Interchange (ASCII) 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.

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 ICT includes, but is not limited to, telecommunications products (such as telephones), information kiosks and transaction machines, World Wide 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 information technology is integral to its operation, are not information technology.

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.

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. Information and communication technology.

Requiring Official. Federal personnel who generates the request for or specifies the information and communication technology product or service to be acquired, developed or maintained -- must ensure that the acquisition of ICT products and services meet the Section 508 ICT accessibility standards, unless an exception applies.

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. Significant difficulty or expense. In determining whether an action would result in an undue burden, an agency must consider all agency resources available to the program or component for which the product is being developed, procured, maintained, or used.

GLOSSARY

G.2. ACRONYMS.

CAP	Computer/Electronic Accommodations Program
CFR	Code of Federal Regulations
CIO	Chief Information Officer
DoD Section 508 Form	DoD Section 508 Issues, Complaints and Concerns Form
DOJ	Department of Justice
EEO	Equal Employment Opportunity
FAR	Federal Acquisitions Regulation
GC	General Counsel
GPAT	Government Product Accessibility Template
IAW	in accordance with
ICT	Information and Communication Technology
IT	Information Technology
KO	Contracting Officer
OCIO	Office of the Chief Information Officer
TTY	Teletypewriter
VPAT	Voluntary Product Accessibility Template

REFERENCES

Code of Federal Regulations, Title 36, Part 1194
Computer/Electronic Accommodations Program (CAP) <https://www.cap.mil/>
DoD Directive 5105.64, "Defense Contract Management Agency (DCMA)," January 10, 2013
DoD Directive 8000.01, "Management of the Department of Defense Information Enterprise (DoD IE)," July 27, 2017, as amended
DoD Manual 8400.01-M, "Accessibility of Information and Communications Technology (ICT)," November 14, 2017
DoD Instruction 8510.01, "Risk Management Framework (RMF) for DoD Information Technology," March 12, 2014, as amended
Federal Acquisition Regulation, Part 1.603-3
Federal Acquisition Regulation, Part 39
Federal Acquisition Regulation, Subpart 13.2, January 19, 2017, as amended
Public Law 88-352, "The Civil Rights Act," July 7, 1964
Public Law 106-65, "National Defense Authorization Act for Fiscal Year 2000," October 5, 1999
The Access Board, "Information and Communication Technology (ICT) Standards and Guidelines," March 21, 2018
United States Code, Title 29
United States Code, Title 42