

Reclamation Manual

Directives and Standards

Subject:	Accessibility to Information and Communication Technology: Section 508 of the Rehabilitation Act
Purpose:	This Directive and Standard (D&S) establishes processes to provide Bureau of Reclamation personnel information on complying with Section 508 of the Rehabilitation Act (Section 508). The benefits of this D&S include improved collaboration and communication between the groups largely affected by Section 508 and increased resources for all employees to make information more accessible.
Authority:	Rehabilitation Act of 1973 (Pub. L. 93-112, Title V, Section 508; 87 Stat. 355; 29 USC 794d), as amended; 375 Departmental Manual (DM) 8, Section 508 Program and Responsibilities
Approving Official:	Associate Chief Information Officer, Information Resources Office
Contact:	Information Management Group (84-21210)

1. **Introduction.** Section 508 and its amendments prescribe how Federal agencies conduct business to offer Federal employees and members of the public with disabilities access to and use of electronic information and data, that is comparable to the access and use by Federal employees and members of the public who are not individuals with disabilities, unless an undue burden would be placed on the agency. This D&S establishes requirements in addition to those in the Rehabilitation Act and 375 DM 8.
2. **Applicability.** This D&S applies to all Reclamation personnel who:
 - A. create and disseminate electronic content that will be accessed internally (by Federal employees) and externally (by members of the public); and
 - B. develop, procure, maintain, or use Information and Communication Technology (ICT).
3. **Program Administration.**
 - A. **Accountability.** Directors, managers, and supervisors are ultimately accountable for ensuring adherence to the accessibility requirements for their programs' employees and organizations.
 - B. **Designation of Section 508 Coordinators.** The regional directors; Chief, Public Affairs; Chief, Contracting Office; and Manager, Enterprise Operations Division (EOD) must designate Section 508 coordinators for their regions or offices who can advise on each program requiring additional duties under Section 508 and requirements in this D&S: acquisitions; information technology (IT) and application development; and web management. The Reclamation Section 508 Coordinator will maintain the

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current contacts for each group, and these are posted to Reclamation's Section 508 Intranet site.

4. **ICT and Electronic Content Requiring Accessibility.** Section 508 requires that Federal employees and members of the public have comparable access to information and data as do individuals without disabilities.
 - A. **ICT.** Supervisors and program managers must ensure ICT is provided to their employees and the public who need access to their program's information and data.
 - B. **Electronic Content Requiring Accessibility.** Electronic content creators must ensure that the following types of electronic content are accessible:
 - (1) public facing content or content which is available to the general public must comply with the United States Access Board's [E205.4 of Appendix A to Part 1194 of Section 508](#), based on the current Web Content Accessibility Guidelines ([WCAG](#)); and
 - (2) electronic content which is not public facing, but constitutes official agency business and is communicated under one of the [nine categories in E205.3](#) must comply with the accessibility requirements in the U.S. Access Board's [E205.4 of Appendix A to Part 1194 of Section 508](#), however, non-Web documents may exclude some requirements (see [E205 Exception](#)).
 - C. **Creating Electronic Content.** Offices and employees that provide or create electronic content requiring accessibility must ensure the content complies with the Section 508 Accessibility Standards, by testing and remediating the content utilizing the software used to create the content.
 - D. **Training.** Employees who create content requiring accessibility must complete training on how to create electronic content which conforms to Section 508 requirements, as often as is required to fulfill their functions. See Reclamation's Section 508 Intranet site for training resources.
 - E. **Concerns with Compliance.** Supervisors and program managers must address concerns regarding accessibility of ICT and electronic content brought to their attention by employees or members of the public. Concerns may be mitigated internally or resolved with the consultation of the Reclamation Section 508 Coordinator or the Department of the Interior's Section 508 Manager. In cases that remain unresolved, Reclamation's Section 508 Coordinator or the Department's Section 508 Manager will refer employees or members of the public to the appropriate complaint process.
 - F. **Exceptions.** If needed, supervisors or program managers will contact Reclamation's Section 508 Coordinator or the Department's Section 508 Manager to seek remediation and/or seek an exception to the Section 508 Accessibility Standards due to: Undue

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Burden; Fundamental Alteration; or Commercial Non-Availability reasons in accordance with the process defined in 375 DM 8.

5. Websites.

A. Website Content.

- (1) The Reclamation Web Manager, web designers, web developers, and others who create websites for Reclamation will ensure Intranet and Internet web content, including links to web applications and non-hypertext markup language (i.e., HTML) files, fully conforms to the current WCAG for Federal Section 508 Accessibility Standards.
- (2) The Reclamation Web Manager, web designers, web developers, and others who create websites for Reclamation will request remediation by the submitting program office when materials do not appear to meet Section 508 Accessibility Standards. The submitting program office must provide accessible content for its websites.

B. Website Compliance Testing. The Reclamation Web Manager and other web managers must assist with testing on websites and remediate website content to respond to the Department's or Reclamation's web content accessibility reporting tool.

C. Website Platform Issues. When large Reclamation-wide web platform issues are found, the Reclamation Web Manager will work with Reclamation's Section 508 Coordinator and the Manager EOD to resolve system-wide issues.

6. Contracts and Procurement of ICT Systems and/or Electronic Content.

A. Contract Requirements. Contracts must define ICT accessibility requirements and include them in contracting documents, such as Specifications, Statements of Work, Performance Work Statements or system requirements documentation. Contracting Officer's Representatives (CORs) and the program office requester have three options for defining and including accessibility requirement in the solicitation:

- (1) Use the predefined solicitation language offered through the General Service Administration's (GSA) [Accessibility Requirements Tool](#) (ART) to determine if Section 508 requirements apply and if so, to generate language to include in contracts for the specific ICT to be purchased.
- (2) Use the GSA's ART to build customized solicitation language for your accessibility requirements.

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- (3) Manually determine requirements utilizing the [Section 508 Standards Applicability Checklist](#) and the [Section 508 Applicable Standards and Exceptions Chart](#).

B. Accessibility Documentation. CORs and program office requesters will request vendors supply documentation or voluntary product accessibility templates (VPAT) during market research and when evaluating proposals to support Section 508 compliance of products, in accordance with the GSA Government-wide IT Accessibility Program's standards and requirements for ICT items (found at <https://www.section508.gov/>), if applicable or required.

C. Verification and Contract Administration.

- (1) CORs and program office requesters will work with the IT Accessibility Team to review product documentation and test products to verify compliance with the requirements of Section 508 on products received by Reclamation.
- (2) When products are found not to be compliant, CORs and program office requesters will utilize contract administrative remedies to mitigate issues.

7. IT Testing.

A. IT Accessibility Team. An IT Accessibility Team will be created consisting of the Reclamation Section 508 Coordinator and members from the IT community selected by the Manager EOD. This team will meet regularly to successfully enact systematic IT testing in Reclamation.

B. Process and Prioritization. The IT Accessibility Team will initiate a standardized testing process and prioritization to assist in the implementation of Section 508 authorities, procedures, testing, and documenting ICT.

C. Test Process. IT Accessibility Team members will become Certified Trusted Testers for Section 508 compliance by completing training through the Department of Homeland Security's [Trusted Tester Certification Process](#) and are responsible for:

- (1) testing Reclamation's system using the [Section 508 Standards Applicability Checklist](#) and the [Section 508 Applicable Standards and Exceptions Chart](#); and
- (2) maintaining Reclamation's testing results in a manner which can be extracted and sent to the Department for reporting.

D. Coordination with CORs and Program Office Requesters.

- (1) The IT Accessibility Team will test ICT products when requested by acquisitions staff.

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- (2) The IT Accessibility Team will review product documentation for meeting Section 508 Accessibility Standards for purchased ICT products, usually VPAT, provided by acquisitions staff.

8. Definitions.

- A. **Content Requiring Accessibility.** Any electronic content which is required to be accessible with Section 508 and can include electronic documents, spreadsheets, videos, and multimedia products.
- B. **Electronic Content Creator.** Reclamation personnel who create or modify electronic documents, spreadsheets, videos, multimedia products or webpage content for dissemination internally or externally.
- C. **Information Communication Technology or ICT.** ICT broadly encompasses electronic and information technology covered by Section 508, as well as telecommunications products, interconnected Voice over Internet Protocol (i.e., VoIP) products, and Customer Premises Equipment (i.e., CPE) covered by [Section 255 Guidelines](#). Examples of ICT include computers, information kiosks and transaction machines, telecommunications equipment, multifunction office machines, software, websites, and electronic documents.
- D. **Undue Burden.** Significant difficulty or expense. For purposes of meeting accessibility guidelines, an undue burden often refers to the process Reclamation would utilize to officially request an exception to the Section 508 Accessibility Standards, in accordance with 375 DM 8.
- E. **Voluntary Product Accessibility Template or VPAT.** A VPAT is a document that explains how ICT products such as software, hardware, electronic content, and support documentation meet (conform to) the Section 508 Accessibility Standards for IT accessibility.
9. **Review Period.** The originating office will review this release every 4 years.

RECLAMATION MANUAL TRANSMITTAL SHEET

Effective Date: _____

Release No. _____

Ensure all employees needing this information are provided a copy of this release.

Reclamation Manual Release Number and Subject

Summary of Changes

NOTE: This Reclamation Manual release applies to all Reclamation employees. When an exclusive bargaining unit exists, changes to this release may be subject to the provisions of collective bargaining agreements.

Filing instructions

Remove Sheets

Insert Sheets

All Reclamation Manual releases are available at <http://www.usbr.gov/recman/>

Filed by: _____

Date: _____