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Section 508 Resources

John Sullivan

JOHN SULLIVAN: Is this on? Yes. Okay. Good afternoon everyone. I hope you're enjoying the day here with us at lovely GSA. My name is John Sullivan I'm the director for the government-wide 508 Program here here. I'm lucky to have the resources on my team across the whole government in terms of our government-wide team. All of these government resources we're talking about did not come from us. They came from the collaboration and a lot of Robert -- he's the most prolific writer I've ever run into. He can just produce content. So I want to talk about specifically here today, how to sort all of this out, and how to start applying and how to use it, and some specific resources and tools that we're putting on the table to help simplify and automate the process. I don't know if you've had the time in the conference room there, we have a table there where we're doing some demos of the things that we're going to talk about here. If you haven't gone to see them credit, go ahead and do so. There's just a lot on the plate here. So the three areas that we're talking about are really around tools of the procurement process, technical assistance, AKA guide materials around running 508 Programs, and training materials. So I want to talk about, if you go through the lifecycle, you have to define the accessibility requirements. And you to make sure those accessibility requirements make it into procurement. And that's one of the tool there. Then you have to check and see, you know, when a product is built, is it accessible? So state the requirement, requesting the requirement, and evaluating it to make sure you've got it in there, if you require testing, getting the testing done, and then looking at the finished product and how accessible is it. If you think of that as a lifecycle of it's own, that's the type of things we'd like to help you do. Because those are also for the agencies that are subject to the OMB biannual roaring on the maturity of your program, those are the things you do the self assessments on. We're looking to make that connection back to how you actually assess the maturity of your program, and these are some of the elements in there.

So we have -- so you've heard throughout today about how to request accessibility information, the checklist of how you -- okay, what should that accessibility requirement be, that whole dialogue that Robert is talking about with the vendor. You don't just state the requirement. You've got to put it in terms of someone's going to listen to it. This is what I expect. This is how the testing is going to happen. I expect you, the vendor, to do the testing. I expect you to allow the government to do the testing. I expect testing to happen before award or is it just post-award. And then what happens if, et cetera that if that's not all spelled out in the contract, good luck getting it.

And the roadmap; the way we've arrayed a lot of the information, we're trying to make this clearer on section508.gov and in the Toolkit is that, what's really changing? What are you going to do by January? And then after January, what do you do differently than you're doing now? It all makes the assumption that you're running a program and you're doing it now. If not, you know, the hurdle is greater.

And so what we have -- we have some materials out there that are just about okay, you know what you're doing, here's what's changed. And then here's program management materials infused are now informed by the new standard and the new set of the rules. And so you'll see that. So like this Agency Roadmap is one piece that was produced by the transition team that is just that. It's everything you need to do about -- how the run a program. It's not specifically about the transition. But it certainly reflects the new transition and the new standard in there. The accessibility module is not new, we put it out there a year or so go, that does minor, all it does is three accessibility error checks. Three of the easier ones, three of the buns that were most high confidence in terms of false positive, and false negatives about doing accessibility checking. It's there for you to use and is kept in the staging issue because the whole issue came up should it be public or should it not be public? I want to talk to you about the path forward on where all these things are headed into a digital dashboard which is going to be compliant with other things -- combined with other things which is not going to be public. But it will be available for the federal community to use.

Then the third piece of this is that Helen's been leading is the redevelopment of training courses. So the first thing is the training inventory, all the training out there, that we're providing the Access Board's providing, I'd like to get a handle that you as agency leads are developing and can you share that with others?

You may be situated you're running a training session, you can invite the agency across the street to join you. Or you may just want to have your materials can be lifted and reused. Or is it so specific to your agency that some of them would have to recreate it on their own. But the first thing is just awareness. Know what's going on down the street and what somebody else has got for training.

So we're limited by, we we have research the public side. We reference some of the academia, but we are limited in our ability to reference all the commercial stuff that's available. Although, we try to point out whether they're kept. But specific online training that Helen's got lined up here is the micro purchasing training course which is available? Redone? It is available. Section 508 basics, which is the next one to roll out. And Helen can speak to those timelines, maybe if need be. But they're all -- we're days and weeks away from all of these.

A training course around the IT Accessibility Playbook, taking the playbook that the creative community developed a year or so ago and actually, okay, let's turn that into a training discipline. The procurement training course, is the longer one which goes along with the whole procurement lifecycle of the different pieces. And then I wouldn't say Section 508 for dummies for the Section 508 for executives. One of the points you really need the do, what does a executive need to be concerned with in terms of the liability and the risk management, and what a program should be? Short, no test. It's like 12 slides. Okay. Thank you, Helen.

And so, for the time being most of the online courses are going to be on the Federal Acquisition Institute Learning Management System recognizing not everyone that need to can access that list they are redundantly posted on section508.gov. Some like the executive training course it's just a presentation, it will just be on section508.gov. Next slide.

Okay. So when you go on the website you'll see in the left hand column there, there's -- I can't think of the title of the document, but it's a quick reference guide to the transition. It's in the Toolkit, but in the Toolkit, the Toolkit is split up basically into two columns. The left column are direct things about the transition. And the right-hand side of that page is materials that are about program management materials that now reflect the new standard. They much broader than here's what you to do just because of the standard. So, what I tried to the in this is put this together as saying, okay, what is the activity that you do? What's changed in that activity? Where do you go to get guidance? Some more nuances of the word "guidance" where can you go to get guidance? The tools in where do you get the training? Where do you find it?

What are the possible measures in this area? Some of those are the things you're measured On the biannual report that you send up to OMB or that, actually, you know we do a lot in the analysis of that material, the synthesis and the analysis of that material. Not all of these are definite metrics, but I wanted to point in here, what are the types of areas that you can actually get some metrics to try to understand. All of that is here to help you, help you mature your program. If you can't manage it, you can't measure it. Not all of these things can be measured that easily. But we want the start getting at the measures here.

Step one, specify the government's accessibility requirements for new ICT projects. Things that you go through the procurement process, obviously. But also for things that you don't necessarily procure but you might have developed in-house with some other ways. You still have to -- if you want to be accessible you to specify the accessibility requirement.

You know what's changed is the scope, you know, it reflects the WCAG 2.0 standard. So the standard to which you're making requirements too have changed you go out to The Revised Section 508 Standards Applicability Checklist developed by the transition team you can pick and choose, okay, here's the requirements. That's out there as a document. It may end up being out there as a fillable pdf. But in addition to that, we are redeveloping the buy accessibility wizard into this accessibility requirements tool, that's what's on display out there.

That goes out in just, automates basically the checklist. You go through this. This is a little application, simple software that just goes and say, okay, do this, this, this with software, hardware, electronic content, or support documentation, therefore the requirements that I need to lift it lifts and recreates a document much like the GPATS were in the past, here is a document you can attach to the contract or some other way, this is a specification of the requirement. As we've been talking all day, it's not just about specify -- specifying the requirement without putting the terms and conditions on it doesn't necessarily get you all the way. That's what all the other documents are for. That's what that does. That is specifying the government's requirement. And then when you ask the vendors, potential vendors or the post-award vendor to identify how they're going to meet that, that's when the VPAT, more generically labeled the Accessibility Conformance Report based upon that template format, that's the response. I think I mentioned in one of the sessions this morning, we very intentionally structured these so they follow the same logic, and you can do the comparison. If you're part of the evaluation, you want to evaluate something to say does it meet the standard, if they're coming in with a VPAT format, you can again, it's your requirement, it would be nice if you can crosswalk those. That's what we've intended to the in that document there.

We -- trainings is available. The basics course, the procuring section, procuring 508 conformant ICT products and services, that's the procurement course we're talking about. And the measure on that you report every six months is the solicitations with the accessibility requirements that you've looked at are compliant. You make a couple of different metrics around that. The next activity is ensuring the so will solicitations contain the appropriate contract language. Basically, you know, when you go out and you look at your procurements, your solicitations, are the right requirements in there? So, getting them in there, this document best practice, how to request accessibility requirements from vendors and contractors, which Robert was talking about earlier, both of these, define accessibility terms and conditions, those help you with in addition to stating the technical requirements, here's the actual contract clauses that you may want to put in there about the contractual relationship and the expectations around the requirement. Okay. We're building this solicitation review tool, which is a piece of artificial intelligence that is going out, scanning Fed Biz Ops daily, and using 1 different algorithm, coming up with a diction, A is it ICT? Based on those 19 predictions, is it likely to contain the right technical requirements or not? And so, this is a targeting tool for you. You may have 100 different solicitations hitting Fed Biz Ops each week. Most people will never have the time to actually review those. This will point out to you, here are the ones -- the odds are right, it's good. You don't have the look at it. Or put in at the bottom of your list. The odds are right, this one, you start looking, it lets you know the dollar value of that contract et cetera, you start to realize, this is a important thing, big breadth, and we need to take a look at this. So again, this tool is designed, it's going out, with weekly reports. That's Cadence we're looking at, the reason for that is when it first Fed Biz Ops, is this a requirement this is a tool that might help you do that. Ideally this is already late in the process. Contract writing systems should put the requirements right in, that's a goal down the road. That was not done when we have the ART tool out there, what was Buy Accessible to do that. I would like to work with Fed Biz Ops, the redevelopment of that whole award system management environment in here that procurements aren't even accepted in Fed Biz Ops without the right language in there, that's a down the road to-do piece here, because a that whole environment is being reengineered as I speak and more planned for that.

So basically, just to make this a little quicker here. Making sure the requirements are in there, procuring, and then you know, the training is available, it's the procurement training in the micro purchasing creating -- we'll talk to these things here as well. Again, you know, how many solicitations have you corrected to include the accessibility requirements? That shows a much more mature program, if you actually come up with some statistics that you know, this is how many fixes we made there. Okay. Anticipating the lifecycle is the term that's used in that reporting mechanism, updating your policy, all the work has led to put this in place. Debbie has led to put in place, accessibility policy, the document is being renamed. I'm not sure the final name of the product you put out, there are recommendations around policy.

»» It best practices, how to revise your policy.

JOHN SULLIVAN: That's the point, that reference material is there for you. There are no specific tools around that. But that will be called in the Section 508 for executives training and the playbook training. The document that's there is available on the Took Kit on 508.gov. That lead to the your measure and maturity of your accessibility policy. Are you thinking of having a policy? Do you have one? Do you actually follow it? And can you measure it? That's the way that progression works.

Ensure accessible electronic content, what's changed is the breadth, the scope of the electronic content, is broadened to include the internal document agency correspondence. You have the ACOP documents, listed here, the list here didn't make it into the slide but it already. It's a long list, it is all on the website about how to make different documents accessible. And there are tools, commercial tools available for auditing accessibility audits tool, some of which are on display across the hall here. But there's a series of tools out there. They're actually auditing accessibility of your documents, and there's a couple of different approaches they take, either they come in and fix it in the document, some of the pdf repair I do. and the other approach to come in, create a overlay and create a presentation layer over your documents which ensure that as it's being viewed, it's accessible. But it doesn't actually change and fix the native problems down there. There seem to be in the marketplace both of those approaches, they both seem to be coexisting pretty well. The ACOP is on the training videos, the metric on that is the number of accessible documents you have or percentage inside, that's internal documents, and documents that you go external to your agencies and to your websites.

The testing is the next line item there. You to test your products, software development for accessibility. Testing are in the process of being updated. If you get to it you can find the links on the Trusted Tester Program. The tools, it's not per se, tools rather than methodology around the trusted tester protocol. And there are training courses around trusted testing, the prerequisites are being put up with our stuff on FAI, and others are DHS is hosting. Get to the number of products you've tested, the number of certified -- I can talk, certified trusted testers you have in your organization, and a way you can measure that. Okay.

So you've procured the stuff. You've brought it.

You've done some testing during the development. Now, when the product is a website, is it accessible? And again, here what's really changed is that the WCAG 2.0 standards are what are applicable now. The guidance off the web site, and this is the piece we said, we put out there, the Pulse accessibility module, the part of Pulse right now you're doing three checks that were Section 508, we built in a lot around the WCAG but we took the advance of the community and pull them out until WCAG 2.0 became the law of the land. And we will be building more back into that, you want to go, bigger and better, there's a whole commercial market. Some in the room across the way. And some don't actually fix the problem, the commercial overlay products are out there as well. There's WCAG training available from several references of that. Some of that right through the federal space, but also more through W3C, there's a lot of commercial training. We did not feel the need to replicate WCAG training, since there's so much out there.

You're measured on the number of accessible websites the number of improved websites, that's what you can do there. What's new is know the agency need, explicitly survey to identify the number of people with disabilities. We spoke about that, Robert spoke about that earlier about, in Debbie's conversation around the policy, that Section 501, 504 you to roll that community in and figure out what's the best way to do that. Technology Playbook as a piece on that. And the metric on that is the number of employees with disabilities with assistive technology successfully deployed. We can think of some more metrics there as well. All of these things help show what you've done is a good program. Do you a compliant process? No change to the requirement to have a compliant process. The definition of complaint, complaint, that's a complaint process. Yeah, yeah, I'm saying -- there's no change to the complaint process, but the complaint about things being non-compliant, which is where I was going, may be new and may grow, so you may pay some special attention to the complaint process, our technology playbook references that, to the Best Practices Library you can measure it by the number of complaints. You're graded on the maturity of your complaint process, do you have one? Do you do anything about it? Et cetera. These two slides here in a snapshot, these are the heart of the document out there, the quick guide to the changes is what changed and what has to be done differently and how do you measure that? And then, all this is available on the website particularly the revised Section 508 standard Refresh Tool Kit pops up here, you see it on the bottom right here. There's a lot that we're thinking of doing with the website and we want -- definitely user feedback on how to upgrade and change a lot of the website, there's a lot of fusion, there's a lot of other accessibility information coming out out there, particularly in the development sphere. There's a lot with the disability Guild, the developers and the connection of building for accessibility and universal design and the UX community. So we're really looking to fuse a lot of that together. Just to brief overview on, these are on display across the hall here. Again, there's a automatic to step one, go rate your accessibility requirements. You have the checklist, the Transition Checklist Guide that walks you there this. And you'll have this tool that will walk you through it as well and generate the output for you. We have the first basically an VMP stage with it right now. It goes through. It asks the question. We try to explain the question in plain language. And we give an exam approximately. And then the right citation, the direct citations out of the law. The citations in the law are exactly as said. What we find here is a need for lots of people in varying levels of accessibility to be able the use this tool and understand and at least get a good shot at defining the requirements. There's a lot of terms in there and stuff that don't -- doesn't resonate with a lot of folks. So we're looking at building a decent glossary around that, so you can relatively, minimal experience, really in the accessibility lane, at least be able to ask the right questions and be able to generate the requirements. So this just walks through and generates the customized output that you can save as an attachment, or incorporate it into the document.

This I mentioned Solicitation Review Tool we're actually thinking this is much bigger than accessibility, because this can just put in different algorithms whether you're looking for accessibility, whether you're looking for security, management, whatever you might be looking in a procurement solicitation is what language should be in that solicitation. And then it will generate a workload list of here's the solicitation, here's the ones we think are good. Here's the ones we think have a problem. There's a link to the POC listed in Fed Biz Ops right out of the solicitation and the Section 508 Program management of that agency, it emails them straight to them. That's what we're putting in place. It's a prototype now. It needs a permanent, the ONM tail on these things have to be supported, that's not necessarily defined. But this is a very interesting tool. And it will automatically generate for you the solicitation, if you change and they get fixed this will pick it up and identify which solicitations that you've now included. So in terms of those metrics of how much solicitations have you worked that need to be fixed this provides you this with an automated tool to help you do that. There's a management model on there as managing the different management access pieces of that. But this is very interesting. Many of you have seen Pulse there's a public side of Pulse which measures other thing, this is not on the public side. This just measure, and goes through. And right now, those are the three measures we're looking for. We're really just looking at HTML tag, the color contrast, and the image description pieces here. And it goes through and sorts it by website or by agencies, it's all available as a download list to you. And this is done with enough read receipts so you can start tracking the changes that come out of those. So that is available and out there for you to use today.

Where is this all going? Where are we going to keep all of this? So we've been building a digital dashboard, a fed-only portal integrated behind MAX to benchmark the websites and right now this is a website bent or a website focus. We recognize a lot of 508 has nothing to do with website, but at least this piece here does. And it's got a series of tools about some government-wide metrics, which is about the only place government-wide compliance reports, and it's geared two at least nine different measures including accessibility. So the stuff, the data out of Pulse the data from SRT, all this data will be fed into this dashboard and will be available, not publicly, but will be available to you to look at to start understanding, here's how I'm doing on several different federal policy compliance pieces here. And then you can go through and search and go through the whole thing.

You can go down in a deep dive for here's my agency. And here's the government-wide pieces to see how things stack up across the federal government. So this piece -- everything I've shown I couldn't hear is available MVP you can go take a look at across the hallway here. But know that this is our direction in providing a suite of tools that can help you manage your program. Is Anetta here? She's not in the room, Arnetta White from NavAir is on my team right now as a detail. Her main assignment is to look at all these things we're trying to put together as aids and have you actually incorporate them into your business process. It will get the wrinkles out of what's useful what's not useful, Arnetta will be with us for awhile focusing on how to actually integrate these into your practice.

So I am not a agency 508 coordinator, I don't run that practice. But most of you do, certainly Arnetta does, working with our own inside, Chuck inside GSA that's our approach of working through that. I think that's all I have to go over -- oh. And the training courses I think we've already talked about them.

HELEN CHAMBERLAIN: I added the dates. So we've got five courses that we're doing. So the micro purchase course is already published on the Federal Acquisition Institute that is FAC 047. So anyone who has a purchase card probably will need the take that in order to keep their purchase card certification current.

Section 508 what is it and why is it important to you is going to be published on FAI, we'll probably hopefully by the 31st. But again when we get it to them, then we're subject to their rules and regulations. That is FAC 049. That course and the procurement course, which I want to have up on FAI by December 31st, those three courses can be taken to continue your procurement certification if you have one. It's better to take them on FAI, because it automatically tracks your points, okay. And then we've got the Playbook, and we've got the executive course. All five of those will be resident on section508.gov. Anyone can go out there and take the course. It will be HTML, there will be knowledge checks, but there will be no exam. You will get a certificate of completion with points on it that you can have your agency convert. So we have both of those. Yes, Rodney?

»» Is the number for the contract -- question.

HELEN CHAMBERLAIN: Yes, it is. The procurement course will be FAC 056. That will replace that course. I think that's it. The overview for -- the executive overview, that is going to be posted probably way sooner than December 31st. That's just a course for executives. It has no test, it has no knowledge checks. It's basically an overview for them just so you can tell them, here, go take this and you'll know what I'm talking about. So that's basically what we're doing.

JOHN SULLIVAN: Thank you. And these will all be done before December 31st. Because my resource pattern changes on December 31st here. So, questions? In the white. First.

Question: How can we get on a listserve so we can get this notification, or these notifications.

HELEN CHAMBERLAIN: Email me, Helen.Chamberlain@GSA.gov, I'll put you on the listserve.

Question: When you were talking about metrics, you said that one possible metric might be how many people with assistive technology, or how much assistive technology is installed is what I took it that you were saying. So how might you handle the fact that you could have Jaws on there 25 times installed on your network, but only 5 people are using it as an accommodation, the other to think they're using it for testing. So, would you consider that you've got 25 on there? Or would you expect that the agency would sort out the accommodation from the productivity?

JOHN SULLIVAN: I think the latter is what you want to do, as long as you have the insight enough to know that those 20 people are testers and not actual users.

»» I would think so too. I think that that's something to put back to IT that they need to track this stuff that it's a difference between line of business versus accommodation.

JOHN SULLIVAN: I think you see a different use pattern. Tester is not going to be using it as much as someone who actually need to use it. Over time you would be able to.

»» That would mean frequent testing of the whole network to see. That's not going to happen.

JOHN SULLIVAN: Good illustration of how error gets introduced into data. And you can never completely trust your data. Another hand up here?

Question: Well mainly I just wanted to know about registering to get onto the classes, she was saying about the listserve, to go on that site, do you have to click on anything, what do you have to do in order to take the training?

HELEN CHAMBERLAIN: To go on the Federal Acquisition Institute you have to actually register an account. And it's www. FAI.gov. And if it asks you for a supervisor you can put John, because after December, I won't be here. John Sullivan. (Laughter), John J Sullivan.

»» Thank you.

JOHN SULLIVAN: Or they can do their own supervisor.

HELEN CHAMBERLAIN: Or you can do your own supervisor. With the military, with the military it's amazing. You get an accommodation every year of like thousands of accommodation of thousands of military people who have to take the micro purchase course. In order to take it a supervisor has to be registered on FAI, the supervisor refuses to register on FAI, that's a vicious circle. I think you had your hand up.

Question: If you're already registered in FAI, they frequently have newsletters and they have notifications that if something is sent out, sometimes they send you notifications and let you know about new courses that will be there.

HELEN CHAMBERLAIN: That's true. So FAI also has newsletters that come out and they inform you of new courses that have been put up and new things that are going on with FAI or FATAS.

»» Is there a cost for the federal government?

HELEN CHAMBERLAIN: No. It's free. It's a federal government LMS.

»» Thank you.

HELEN CHAMBERLAIN: Any other questions?

Question: So I've logged into that, and I've come across the situation where I needed to ask for my supervisor, and it's been a couple of weeks... and so, would I be able to list you as the "supervisor." (Laughter).

HELEN CHAMBERLAIN: Well, the thing is, and that's tricky. I've just been telling people to pick me because I know I'm in the list of supervisors. If your supervisor's in the list, and you pick them, then you have to ping them and say, please could you approve this. I don't think you can unpick them once you've picked them. (Laughter).

»» So in that regard if we put your name or Mr. Sullivan's name, we have to email you guys around ask you to ping us?

HELEN CHAMBERLAIN: No, it will be an automatic email.

»» So he got the email.

HELEN CHAMBERLAIN: He got the email. So for example, I re registered to take the Section 508 basics course because I needed to do something with the slides. And that particular course, I had to have approval for him, so I sent him an email saying hale you'll get an email please approve the course. He did. I got an email saying it was approved. It's a pain in the neck. We are trying to fix that and possibly have another -- use of another type of LMS. But for right now if you want to take the courses, if you want to take the courses and you don't need the procurement certification, take them on section508.gov. Because you've got a certificate of completion, which is the same thing, it will list your CLP hours and everything.

»» But if you're trying to keep your certification up for your COR, then your real supervisor needs to be there. Because that's how you're procurement people are going to approve that you did what you needed to do.

HELEN CHAMBERLAIN: True. So if it's certifications that are involved you have to.

»» So if the supervisor's names are not on there like for our agency.

HELEN CHAMBERLAIN: You have to ask them to register. I know, I know, that's the problem. Yeah.

»» Then whenever you register for a class, sent them a email with your little notice that say, I registered for this, you need to go in and approve it because they have to log in to check.

»» And it's free.

HELEN CHAMBERLAIN: You don't have to log in, because I get an email saying approvals required log in here to approve the classes.

JOHN SULLIVAN: I would have to say, to your supervisor, just say, a friendly little prod, because emails get 600 deep like in an hour sometimes. You know, it can get lost. Rodney?

»» The other thing is, (Low Audio).

»» If you're a Jaws user, you have to -- (Low Audio).

JOHN SULLIVAN: Yes. Everyone didn't hear that. Rodney's point was, a lot of emails from FATAS can end up in your spam or junk folder, that could be in your supervisors too. And it's not completely accessible for Jaws users too.

»» You can use jaws, I'm on a certification manager, I'm a bureau manager, so I know a lot about FATASI approve a lot of stuff. So if someone needs help with FAI TAS you can email me. On the even bother with the help desk. Don't bother -- for the videos they have up there, they're not accessible. Just so you know.

JOHN SULLIVAN: Yeah, you know, some of the frustrations that Rodney's dealing with, FAI help desk and stuff. I will say, one of the limitations of FAI is everything out there is supposed to be a procurement course. We're envisioning training far beyond the procurement realm. So we are going to have to find a new LMS somewhere else. There's a couple of options that are being bandied about, they all require reality, money and develop. time. But I know even here in GSA, we do internally as a training LMS, and considered to be offered outside the agency. And so, because yeah, we understand some of the issues of working with FAI, right. Is anyone here from FAI today? (Laughter). Shucks. You.

»» They don't admit to it.

JOHN SULLIVAN: Uhm, anything else? Anything I didn't think was important. Those of who have been writing this stuff, Kathy? Debbie? Well then I just want to thank you all and thank Helen for putting this great event together. (Applause).

HELEN CHAMBERLAIN: Thank you, John so much. And that concludes it. The exhibits are open for another 15 or 20 minutes. If you're going home safe journeys, you got a little bit of your day back any way. And we will see you next year. Thank you.