



Welcome

Meet Mary. Mary works for a Federal agency and is an authorized Government buyer with an official Government purchase card.

Mary's office has an outdated and inefficient combination copier, printer, and scanner. Mary's supervisor asked her to purchase a new multifunction machine for the office. The new machine must be able to do the following:

- Print
- Copy
- Scan
- Fax
- Email
- Connect to the network via LAN
- Connect to the wireless network (optional)

Mary's supervisor, concerned about possible budget cuts, tells Mary that she must find a multifunction machine that meets all their requirements but does not exceed the micro-purchase threshold. Then, her supervisor reminds her that a multifunction machine is Information and Communication Technology (ICT), so it must be Section 508 conformant.

Purpose and Objectives

The purpose of this course is to explain how Section 508 requirements apply to ICT micro-purchases. To achieve this goal, we will follow Mary through the process of acquiring her multifunction machine.

By the end of this course, you will be able to:

- Define Section 508 and how it applies to your procurement
- Identify a micro-purchase
- Determine the impact of Section 508 standards on micro-purchases

Section 508 of the Rehabilitation Act

For you, and for Mary, to meet the requirements of Section 508, you first need to know what Section 508 is. In 1998, Congress amended the Rehabilitation Act of 1973 to require Federal agencies to make their ICT accessible to people with disabilities. Inaccessible ICT interferes with a disabled person's ability to obtain and use information quickly and easily.

Section 508 was enacted to eliminate barriers in information technology, open new opportunities for people with disabilities, and encourage development of technologies that will help achieve these goals.

This standard applies to all Federal agencies and the U.S. Postal Service when they "develop, procure, maintain, or use" ICT. Under Section 508 (29 U.S.C. 794 d), agencies must give disabled employees and members of the public access to information that is comparable to the access available to others.

Section 508 is a required standard and you have a vested interest to comply.



Accessibility for All

Section 508 addresses accessibility for people with disabilities, including but not limited to disabilities that affect:

- Vision
- Hearing
- Perception of color
- Speech
- Manipulation, reach, and strength
- Language and cognitive abilities

Section 508 applies to all ICT products and services that you purchase, including small dollar purchases known as micro-purchases.

It is recommended that you review the standards and regulations listed below to further your understanding about Section 508 and how you can support implementation.

- [Section 508.gov](#)
- [Section 508 Standards](#)
- [Section 508 Federal Acquisition Regulation \(FAR\)](#)
- [Micro-purchase and the FAR](#)

What is a Micro-purchase?

As defined in the [FAR Subpart 2.2](#) a micro-purchase is an acquisition of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold.

The micro-purchase threshold is \$10,000. Always check FAR Subpart 2.2 for the current micro-purchase threshold information and any exceptions that may apply to your procurement.

Micro-purchases and Section 508

It is important that all Government employees responsible for purchasing ICT, such as Requiring Officials, Contracting Officers, Approving Officials, and other Government buyers are aware of their responsibilities regarding Section 508. Since the Government-wide commercial purchase card is the preferred method to buy goods and services that do not exceed the micro-purchase limit, this includes cardholders using a Government purchase card.

Requiring Officials

Anyone and everyone is or can be a Requiring Official. As soon as you decide you want to procure something, regardless of your grade level or position description, you become the "Requiring Official." For example, a secretary ordering a multipurpose machine or a Program Manager ordering a software application is a Requiring Official. As long as you are in the process of buying something or considering a purchase, you are a Requiring Official. Requiring Officials represent the actual customer side – they "own" the need and requirements that will be met by the contract. If you are a Requiring Official you may have several different responsibilities where you need knowledge and understanding of the Section 508 Standards.



Government Buyers

A Government “Buyer” is formally delegated to procure on behalf of the government and are the only individuals authorized to obligate the government for the purchase of goods/services ([FAR1.602-2](#) and [FAR1.603-3](#)).

Approving Officials (AO)

In purchase card programs, the AO ensures that the purchase card is used properly. The AO authorizes cardholder purchases and ensures that the statements are reconciled and submitted to the designated billing office in a timely manner. The AO should also review proposed purchases to ensure that purchase cardholders comply with Section 508 requirements.

With her need to purchase a multifunction machine, Mary becomes a Requiring Official. She must conform to the Section 508 technical standards that apply to micro-purchases. If Mary is using a Government Purchase card to purchase the multifunction machine, she must also follow the procedures established by [OMB Circular A 123 Appendix B, Improving the Management of Government Charge Card Programs](#).

Knowledge Check

Which of the following statements best defines a micro-purchase?

- A. A purchase of supplies or services, the cost of which does not exceed the micro-purchase threshold
- B. Any purchase of supplies made with your Government purchase card
- C. A purchase of supplies or services using simplified acquisition procedures, the cost of which does not exceed \$4,000

Knowledge Check Feedback

The correct answer is A. A micro-purchase is the purchase of supplies or services, the cost of which does not exceed the micro-purchase threshold. The current micro-purchase threshold is \$10,000.

Micro-purchase Process Overview

To comply with the FAR and Section 508, there are tasks you must perform when making a micro-purchase. While micro-purchases are subject to the same government acquisition rules as larger information technology and telecommunications (ICT) products and services, the process is far simpler for micro-purchases.

It has been a while since Mary has made a micro-purchase with her charge card. To ensure that she remembers all the rules, Mary finds the ICT checklist she created when she first became responsible for buying small dollar products and services for her office. It is comprised of six steps.



Step 1: Determine if Your Requirement is ICT

Once you have determined your business need (the functionality you require), you must begin by determining if that need is considered ICT. ICT is defined by the U.S. Access Board.

Information technology and other equipment, systems, technologies, or processes, for which the principal function is the creation, manipulation, storage, display, receipt, or transmission of electronic data and information, as well as any associated content. Examples of ICT include, but are not limited to:

- Computers and peripheral equipment

- Information kiosks and transaction machines
- Telecommunications equipment
- Customer premises equipment
- Multifunction office machines
- Applications
- Websites
- Videos
- Electronic documents

Mary's multifunction machine is definitely ICT.

Functional Performance Criteria

To be Section 508 conformant, ICT must be functional:

- Without vision
- With limited vision
- Without perception of color
- Without hearing
- With limited hearing
- Without speech
- With limited manipulation
- With limited reach and strength
- With limited language, cognitive, and learning abilities

These are the [Functional Performance Criteria](#) as outlined in the Law.

Step 2: Determine Which Section 508 Standards Apply

Once you have determined that your procurement is ICT, your next step is to determine which category of ICT it fits into. That category will define the Section 508 technical standards against which you will be evaluating potential products.

As defined in [CFR Part 1194, Appendices A and B](#), there are four Section 508 technical standards categories:

- Electronic content, including websites and agency communications
- Hardware
- Software
- Support documentation and services (i.e. help desk services)

Mary reviews the standards and concludes that the multifunction machine is considered hardware, so she must evaluate products against those technical standards.

Developing Section 508 Requirements for Procurements

The below tools and processes can help you conduct either a manual or automated review to define accessibility requirements for your solicitation. See [Buy Accessible Products and Services](#) for more information on how to use these tools.

- **Option 1 - Use predefined solicitation language from Section 508.gov for your accessibility requirements, if appropriate.** Section508.gov contains downloadable pre-determined accessibility requirements and solicitation language for over 40 standard ICT procurement categories.
- **Option 2 - Build custom accessibility requirements using Accessibility Requirements Tool (ART).** Use [ART](#), which automates the Standards Applicability Checklist and generates customized solicitation language to build your accessibility requirements.
- **Option 3 - Manually determine accessibility requirements.** Follow this step-by-step guidance on how to Determine Section 508 Standards and Exceptions and complete the Standards Applicability Checklist. Use the Section 508 Standards and Exceptions Chart & Examples template to clearly communicate which standards and exceptions apply to each item in a solicitation that contains ICT.

Failing to include the applicable Section 508 technical requirements increases the risk of your project having schedule/cost overruns or possible remediation after the product has been delivered and accepted. Not developing Section 508 conformant deliverables also puts your agency at a higher risk of being sued.

Request Accessibility Information from Vendors and Contractors

The [Request Accessibility Information from Vendors and Contractors](#) page can help you determine the required standards for the ICT solution you intend to procure. Requirements will depend on whether the ICT is standard or customized. The page also includes a suggested process to help you determine and document the requirements and applicable exceptions.

Determining Section 508 requirements is rather technical, so consult with [your agency Section 508 Program Manager](#) for assistance.

Section 508 Exceptions

There are some [general exceptions](#) that pertain to Section 508:

- Legacy ICT (Safe Harbor)
- National Security
- Federal Contracts (ICT that is incidental to a contract but won't be part of the delivered procurement)
- ICT Functions Located in Maintenance or Monitoring Spaces
- Undue Burden or Fundamental Alteration
- Best Meets (due to commercial non-availability). If there are technically acceptable solutions available in the marketplace, you need to select one of those solutions. You cannot choose a different solution and claim an exception (e.g., "best meets" or "undue burden").

Micro-purchases rarely fall within these exceptions. If you are making a micro-purchase in one of these categories, consult [your Section 508 Program Manager](#) for assistance in properly document the exception.



Mary's multifunction machine does not qualify for any of these exceptions. The equipment she purchases must be Section 508 conformant.

Knowledge Check

The ____ is a tool for generating accessibility requirements to be included in procurement language.

- A. VPAT™
- B. ART
- C. ACR
- D. ICT

Knowledge Check Feedback

The correct answer is B. The ART, or Accessibility Requirements Tool, is a tool for generating accessibility requirements to be included in procurement language.

Step 3: Perform Market Research

Once you know which Section 508 technical standards apply to your micro-purchase, you must perform market research to find possible solutions that could meet your business need. The goal of your market research is to find a Section 508 conformant product or service or decide which of the available products or services best meets the accessibility requirements.

Mary must perform market research to find a vendor that offers a multifunction machine that conforms to all the applicable Section 508 technical standards for multifunction machines.

Conducting Market Research

Steps for conducting market research for accessible products are defined on Section508.gov website in the [Buy Accessible Products and Services, Market Research](#) section.

To perform your market research, you may do any of the following:

- Search the internet for existing Accessibility Conformance Reports (ACR) for the ICT being sought. These are often referred to as Voluntary Product Accessibility Templates ([VPATs™](#)). A VPAT™ is the industry standard template to be used for making product accessibility claims.
- Ask colleagues at your agency, or within relevant communities of practice. The [Section 508 listserv](#) is a great place to get agency feedback on the accessibility of IT products.
- Visit the [Acquisition Gateway](#) (login with your OMB MAX ID) and use the [Solutions Finder](#).
- Visit the [Accessibility Community of Practice](#).

Mary may use these, and other, resources to perform her market research. For more information on conducting market research, see [FAR Part 10](#).

Review Information You Obtain

Next, review the information you obtain. For micro-purchases, this activity will primarily consist of gathering and comparing the ACR or VPAT™ for the options you are considering. Your job here is to identify which option best meets the accessibility requirements you defined in Step 2.

As a best practice, try to find at least two possible solutions, gather the ACRs/VPATs™, and compare their quality. The attention to detail in how a vendor documents the accessibility of their products is a great indicator of how well you can ‘trust’ what is documented. As you review them, consider:

- Is there a clear indication that the VPAT™ was authored by a third party?
- Is there detailed information about the exact type of testing and what evaluation methods were used?
- Are there positive examples of how a product supports a specific success criterion?
- Does the vendor publicly display their VPAT™?

Source: [How to Read a VPAT: Assessing Accessibility Conformance Reports](#), Brian McNeilly, University of Washington, USA, Sina Bahram, Prime Access Consulting, Inc., USA

Scoring ACRs

ACRs include categories rated as “meets”, “partially meets”, and “does not meet” requirements. Assign a value to each of those ratings, then tally the scores, paying greatest attention to accessibility elements most pertinent to the requirements you defined in Step 2.

Of the products that meet the business need, your agency is obligated to pick the item that meets Section 508 accessibility requirements. Document your research, to compare solutions and find one that is the best fit for your agency including at a minimum vendor name, version, and model number, and a description of how the solution will/will not meet your business need.

Evaluating ACRs is not easy for a novice. Do not be afraid to seek help from [your Section 508 Program Manager](#).

The Best Meets Exception

The 'Best Meets' exception provides a mechanism to help agencies balance business needs and obligations to procure ICT and conform to the Revised Section 508 Standards when an alternative that fully conforms is not available.

If there are technically acceptable solutions available in the marketplace, you must select one of those solutions (FAR 39.203(c)(1)). You cannot choose a different solution and claim an exception (e.g., "best meets" or "undue burden").

If your market research does not uncover any technically acceptable options, you can claim exceptions and select a different solution. Of the alternatives that meet your business need, you'll still need to select the alternative that best meets the Section 508 requirements. You'll also need to provide documentation of your market research as justification.

If the product is not accessible, you must determine an alternative way to provide access. The ICT must be accessible and usable by everyone. For example, if Mary couldn't find a multifunction machine that provided all necessary accessibility at the machine's touchpad, that machine would need to be equally accessible from a desktop application.



Knowledge Check

Of the products that meet the business need, your agency is obligated to pick the item that best meets Section 508 accessibility requirements.

- A. True
- B. False

Knowledge Check Feedback

The correct answer is A. Of the products that meet the business need (if none fully conform), you will pursue a best meets exception and choose the product that is most conformant. Where ICT that fully conforms to the Revised Section 508 Standards is not commercially available, the agency shall provide individuals with disabilities access to and use of information and data by an alternative means that meets identified needs. (E202.7.2)

Step 4: Complete Documentation

When you have selected the product that is the best fit for your agency, you must document your justification for the selected product and explain why other possible solutions were not chosen. Document your research including, (at a minimum) vendor name, version, and model number, and a description of how the solution will meet (or not) your business need.

If you are claiming an exception to Section 508 conformance, you must document in writing that your Section 508 PM has verified that an exception applies for your micro-purchase. If you purchase an ICT product or service that is not fully Section 508 conformant, you must document that you conducted adequate market research and provide a justification of your reasons for the purchase (i.e., budget, mission). In addition, you must complete any documentation required by your agency.

At a minimum, it is recommended that you keep a copy of your documentation AND provide a copy to all others involved in the procurement process, such as the AO and Contracting Officer.

E202.7.1 Required Documentation - The responsible agency official must document in writing: The non-availability of ICT that fully conforms to the Standards, including a description of market research performed and which provisions cannot be met; and The basis for determining that the ICT to be procured best meets the Standards consistent with meeting agency business needs.

Step 5: Follow Agency-Specific Policies and Procedures

While all agencies are required to adhere to Section 508, procedures may differ from one agency to another.

As a cardholder, it is your responsibility to be aware of any agency-specific policies and procedures related to ICT micro-purchases and Section 508. If you are unsure of any agency-specific policies and procedures, check with your agency's Office of the Chief Information Officer (OCIO), Procurement Officer, and [Section 508 Program Manager](#).



Step 6: Purchase Product or Service

The final step in the process is to purchase your product or service.

Mary made her purchase of a fully Section 508 conformant multifunction machine for her office as the standard requires, not realizing that she would see the relevance of the standard requirement in action a short time later.

A few months after the new machine arrived, one of Mary's coworkers, Stu, was in an automobile accident and broke both of his legs and lost some of his vision. Without realizing it at the time, adhering to the Section 508 requirements ensured that Mary bought a machine Stu was able to use during his recovery from both his wheelchair and computer because of the built-in accessibility features.

Knowledge Check

Determine whether each statement below is True or False.

Micro-purchase statement	True	False
A Micro-purchase is the purchase of supplies or services, the cost of which does not exceed the micro-purchase threshold (currently \$10,000).		
The Information and Communication Technology (ICT) you are purchasing does not need to meet Section 508 requirements if your acquisition is using simplified acquisition procedures and is below the micro-purchase threshold.		
Section 508 requirements only apply to ICT being purchased for an office with an employee who is disabled.		
As a Requiring Official, or Government buyer, you must determine if your micro-purchase is ICT.		
You have been asked to purchase three new computer monitors to replace aging models used in your office. This purchase is ICT.		
A VPAT™ is the industry standard template to be used for making product accessibility claims.		

Knowledge Check Feedback

Question 1: True. A micro-purchase is defined as the purchase of supplies or services, the cost of which does not exceed the micro-purchase threshold (currently \$10,000).

Question 2: False. ICT purchases using simplified acquisition procedures that are at or below the micro-purchase threshold must meet Section 508 requirements.

Question 3: False. Section 508 requirements apply to ICT purchases regardless of whether a disabled person will be using the ICT being acquired.

Question 4: True. As a Requiring Official, or Government buyer, it is your responsibility to determine if your micro-purchase is ICT.

Question 5: True. A monitor is computer hardware, and therefore, it is ICT.

Question 6: True. A VPAT™ is the industry standard template to be used for making product accessibility claims.



Congratulations

Congratulations! You have completed the Micro-purchases and Section 508 Requirements course. You should now be able to:

- Define Section 508 and how it applies to your procurement
- Identify a micro-purchase
- Determine the impact of Section 508 standards on micro-purchases

Conclusion

You have completed the course material for “Micro-purchases and Section 508 Requirements.”