Section 508 Baseline Reporting template Instructions

# **Background**

On January 24, 2013, OMB published the “Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act - A Framework for Enhancing and Sustaining Management Improvements to Increase the Accessibility of Electronic and Information Technology.” The Strategic Plan required the CIO Council Accessibility Committee (CIOC-AC) to develop a standard government-wide template for agencies to use in reporting baseline compliance of key measures. In response to this requirement, and in partnership with OMB and after Federal Government wide vetting, the CIO-AC developed the attached Section 508 Management Plan Reporting Template. This template is intended to help agencies conduct a baseline assessment of the maturity and effectiveness of their Section 508 programs.

The Strategic Plan also requires Agency Chief Information Officers, in consultation with the Chief Acquisition Officers, to develop a plan for completing an Agency baseline assessment of the Section 508 program. Agency plans should include either a full baseline or a sampling method that represents high-risk or key areas as identified by the Agency. Agency plans should also identify whether the baseline will be performed for the entire Agency or department, or for each component. Agency CIOs are required to share their plans with the CIOC Accessibility Committee to help identify common areas for which collaboration would facilitate completion.

By December 30, 2013, the Strategic Plan requires agencies to complete their assessment using the reporting template and to share the information with the CIOC-AC. The CIOC-AC and GSA will use the information in the assessments for interagency analysis, trending, and planning to improve collaboration across agencies, reduce redundancies, and develop solutions and recommendations for improving Section 508 management across the Federal government. Beginning in the 3rd quarter of FY 2014, the Strategic Plan requires agencies to share progress in improving baseline assessment measures with OMB.

The full Section 508 Strategic Plan can be found at: <http://www.whitehouse.gov/sites/default/files/omb/procurement/memo/strategic-plan-508-compliance.pdf>

Questions on the template should be sent to [feedback@cio.gov](mailto:feedback@cio.gov) .

# **Instructions**

## Reporting Template

The reporting template identifies five Section 508 program metrics. The intent is for each metric to be assigned one of four possible maturity measures (ad hoc, planned, resourced and measured).  The template also provides a section for agencies to record Section 508 evaluation and test results.

The template is divided into four periods. The frequency of the periods is up to Agency discretion, but at a minimum the metrics should be reported on an annual basis.

## Maturity Measures

These measures provide a framework for defining the maturity level of key Section 508 program activities. Agencies should report the highest level measure that best reflects the overall Agency, department or component’s Section 508 existing program status. The measures are progressive; i.e. resourced activities must also be planned, measured activities must also be planned and resourced.

The maturity measures are:

1. Ad Hoc: No formal policies, process or procedures defined.
2. Planned: Policies, processes and procedures defined and communicated.
3. Resourced: Resources committed and/or staff trained to implement policies, processes and procedures.
4. Measured: Validation is performed; results are measured and tracked.

## Section 508 Program Metrics

The template is organized around five metrics which address the key components of a successful Section 508 program.

### Acquisition Metric

#### Definition

This metric defines to what extent an Agency conducts validation of procurement solicitations to ensure incorporation of Section 508 contract language into Statements of Work and Performance Work Statements.

#### Why is this important?

When purchasing technology, an Agency cannot ensure it is purchasing technology which conforms to the Section 508 law unless the applicable Section 508 standards and requirements are included in Statements of Work and Performance Work Statements. Inclusion of Section effective 508 contract language clearly states what sections of the Section 508 standards apply to the technology being purchased, and provide an opportunity for potential vendors to demonstrate they can meet the requirements.

#### Examples

The following examples are provided to demonstrate how an Agency may translate their current operations against the maturity measures and are not intended to represent all possibilities.

1. Ad Hoc: There are no formal acquisition policies, processes and procedures to ensure Section 508 requirements are properly included in solicitations. The Agency approach is defined on a case-by-case basis. Sometimes Section 508 requirements are included in technology procurement solicitations, sometimes they are not. When they are included, in some cases specific applicable standards are identified, while in other cases only generic requirement statements are provided.
2. Planned: Agency acquisition policies, processes and procedures are established that require all technology procurement Statements of Work and Performance Work Statements to include applicable Section 508 requirements or proper identification of an exception, and they have been communicated to the appropriate Agency stakeholders. However, no resources have been assigned to implement the policies, or resources have been assigned but have not yet been trained on how to incorporate Section 508 requirements into procurement solicitations.
3. Resourced: Agency acquisition policies, processes and procedures are established and communicated to the appropriate stakeholders. Agency acquisition staff and Section 508 program support staff are made available and trained in how to select appropriate Section 508 requirements to include in procurements, and when and how exceptions should be reviewed and approved. Applicable Section 508 contract language is properly included in Agency acquisition documents in accordance with established policies, processes and procedures.
4. Measured: Agency acquisition staff and Section 508 program support staff are trained and made available to implement established Agency Section 508 acquisition policies, processes and procedures, and consistently adhere to them. The Agency validates adherence by collecting and tracking data on Section 508 acquisition processes, and uses results to inform decisions and improve the effectiveness and efficiency of Section 508 acquisition activities.

### Agency Electronic Information Technology Lifecycle Activities Metric

#### Definition

This metric defines to what extent an Agency conducts validation of Section 508 requirements to ensure incorporation into Agency EIT life cycle activities, including enterprise architecture, design, development, testing, deployment, and ongoing maintenance activities.

#### Why is this important?

Enterprise life cycles are used to define the end-to-end approach to approving, building, deploying and supporting Agency technology. The least effective and most expensive approach to supporting compliance is to treat Section 508 requirements as an afterthought in response to test results or worse, in response to complaints from people with disabilities. The most effective and least expensive approach is to intentionally and systematically consider Section 508 requirements at all stages of the enterprise life cycle. This is analogous to the saying “it’s cheaper and easier to use an eraser to modify an architectural drawing than a sledgehammer to tear down a wall.”

#### Examples

The following examples are provided to demonstrate how an Agency may translate their current operations against the maturity measures and are not intended to represent all possibilities.

1. Ad Hoc: There are no formal Agency policies, processes procedures in place to ensure Section 508 activities are incorporated into Agency EIT life cycle activities. The Agency approach is defined on a case-by-case basis. Section 508 milestones, reviews and approvals are inconsistently defined or adhered to. Checkpoints for Section 508 compliance, if they do happen, generally occur during the end of the lifecycle.
2. Planned: Agency policies, processes and procedures are established which require Section 508 review and signoff at several milestones throughout the lifecycle activities. Training, consistency and adequate resources to implement these checkpoints are lacking.
3. Resourced: Agency policy, processes and procedures for incorporating Section 508 into enterprise lifecycle activities are established and communicated to the appropriate stakeholders. Agency staff is made available and trained in how to perform activities and conduct approvals. Section 508 life cycle activities are conducted in accordance with Agency policy, processes and procedures.
4. Measured: Agency staff are trained and made available to implement Section 508 activities through enterprise life cycles, and consistently adhere to them. The Agency also collects data on the implementation and results of these checkpoints and uses that data to inform future decision making and planning.

### Testing and Validation Metric

#### Definition

This metric defines to what extent an Agency conducts testing and validation of Section 508 conformance claims.

#### Why is this important?

While a review of Voluntary Product Accessibility Templates (VPAT) provided by a vendor or contractor is a starting point, sometimes testing may be required to validate assertions of Section 508 compliance, to inform remediation planning, and to monitor Agency progress with achieving Section 508 compliance. In addition, testing may be required on an ongoing basis to validate the technology developed, maintained and used by an Agency is compliant with the applicable 508 standards over time.

#### Examples

The following examples are provided to demonstrate how an Agency may translate their current operations against the maturity measures and are not intended to represent all possibilities.

1. Ad Hoc: There are no formal Agency policies, processes procedures in place to validate Section 508 conformance claims. Section 508 conformance claims are taken at face value. There are no resources dedicated to Section 508 testing or if testing is performed, there are no guidelines for when and how Section 508 testing is performed or how results are reported.
2. Planned: Agency testing policies, processes and procedures are established that indicate what should be tested and how testing should be performed and reported, and they have been communicated to the appropriate Agency stakeholders. However, resources have not been allocated to perform Section 508 testing, or resources exist but have not been trained on how to conduct Section 508 testing.
3. Resourced: Agency Section 508 testing policies, processes and procedures are established and communicated to the appropriate stakeholders. Testing staff, as well as other resources if needed, are made available to perform Section 508 testing as directed by policy. Testing staff and/or contractors are properly trained, resources are provided to support testing activities. Section 508 testing is conducted in accordance with testing policies, processes and procedures.
4. Measured: Testing staff is trained and made available to implement established Agency Section 508 testing policies, processes and procedures, and consistently adhere to them. The Agency validates adherence by collecting and tracking data on Section 508 testing activities, and uses results to inform decision making and planning.

### Complaints Process Metric

#### Definition

This metric defines to what extent an Agency tracks and resolves incoming Section 508 complaints.

#### Why is this important?

A clear process for addressing and tracking formal and informal Section 508 complaints is necessary:

* to provide for effective communication with complainants;
* to validate Section 508 non-compliance claims;
* to support an effective Agency response aimed at minimizing legal exposure, costs, and loss of administrative time;
* and to serve as input into decisions related to resource and work planning.

#### Examples

The following examples are provided to demonstrate how an Agency may translate their current operations against the maturity measures and are not intended to represent all possibilities.

1. Ad Hoc: There are no formal Agency processes in place to track and resolve Section 508 complaints. Section 508 complaints are handled on a case by case basis.
2. Planned: The Agency has a formal process in place to address incoming Section 508 complaints. There is a communications plan for informing the public and employees how to use it. However, the Agency has not provided resources to implement the policies, or resources have been assigned but have not yet been trained on how to implement them.
3. Resourced: The Agency Section 508 complaint process is established and has been communicated to the appropriate stakeholders. Section 508 program staff, legal counsel, and other Agency stakeholders, are made available and trained to receive and address both formal and informal Section 508 complaints. Complaints are handled in accordance with the process.
4. Measured: Resources are trained and made available to receive and address all incoming complaints in accordance with the Agency Section 508 complaint process, and consistently adhere to the process. The Agency validates adherence by collecting and tracking data on complaint activities and resolutions, and uses results to inform plans to improve the overall Agency Section 508 program.

### Training Metric

#### Definition

This metric defines to what extent an Agency trains stakeholders on roles and responsibilities related to Section 508 compliance.

#### Why is this important?

Successful Section 508 programs rely on personnel with skills and expertise. In order to effectively implement a sustainable Section 508 program, relevant resources need to be identified and trained. This includes, but is not limited to key stakeholders ranging from web and software developers, acquisition professionals, human resource employees and communications specialists. This clear identification of Section 508 related training needs and solutions is critical to providing equal access to information and data.

#### Examples

The following examples are provided to demonstrate how an Agency may translate their current operations against the maturity measures and are not intended to represent all possibilities.

1. Ad Hoc: The agency does not have a formal training program for educating stakeholders on roles and responsibilities related to Section 508 compliance. Section 508 training is conducted on an ad hoc basis. The Agency does not formally assess training needs related to Section 508 roles and responsibilities.
2. Planned: The Agency has a process in place to identify training needs for Section 508-related competencies and has a plan for developing and delivering that training.
3. Resourced: The Agency has a formal Section 508 training program where needs are assessed, training resources are identified and made available, and key stakeholder groups are trained on necessary Section 508 competencies as an integrated part of their professional development.
4. Measured: The Agency has a formal Section 508 training program where needs are assessed, training resources are identified and made available, and key stakeholder groups are trained on necessary Section 508 competencies as an integrated part of their professional development. The Agency collects data on training activities and outcomes, and uses this information to support decision making, professional development plans, and plans to improve the Agency Section 508 program.

### Section 508 Compliance Validation Metrics

#### Definition

The compliance metrics are used to gauge the extent to which Agency information technology is meeting the technical standards.

#### Why is this important?

The compliance metrics cover those tangible aspects of Section 508 implementation that can be evaluated using numerical measures. The compliance metrics provide an opportunity for those Agencies who claim they are at the “Resourced” or “Measured” level of maturity for Testing and Validation to report the results of their Section 508 testing activities. Over time, compliance metrics should demonstrate the effectiveness of the policies, processes and procedures the agency has put in place to support Section 508 compliance.

#### Detailed Instructions

The metrics should be reported:

* either for the entire Agency or department, or for each component;
* either against a full baseline (i.e. all applicable content), or using a sampling method that represents high-risk or key areas as identified by the Agency.

The specific approach to defining the scope for the technology measured should be outlined in the Agency plan for implementing the baseline.

Depending on how the Agency records Section 508 testing results, the percentage measure can be calculated either:

* as a percentage of applicable 508 standards supported vs. not supported for all technology tested within the category.

In this case, the total percentage recorded in the report would be:

* + Calculate the total # of applicable Section 508 standards supported vs. the total # unsupported for each product/deliverable tested.
  + Total Percentage = the average for all products/deliverables tested in the category.

Example:  85% of the applicable Section 508 standards are supported in our existing Internet websites.

or

* as a percentage of technology products which fully support the applicable 508 standards vs. which do not fully support the standards for all technology tested within the category (i.e. pass/fail).

In this case, the total recorded in the report would be

* + Calculate whether each product/deliverable tested “passes” or “fails” Section 508 compliance. “Pass” means the product/deliverable meets supports all the applicable Section 508 standards.
  + Total Percentage = total # of passes vs. the total number of fails for all products/deliverables tested in the category.

Example:  85% of applications tested fully passed Section 508 testing.

Whichever method is used for each metric, it should be used consistently across each period.