



**USAID**  
FROM THE AMERICAN PEOPLE

# ADS Chapter 551

## Section 508 and Accessibility

New Edition Date: 12/23/2019  
Responsible Office: M/CIO/IA  
File Name: 551\_122319

Functional Series 500 – Management Services  
 ADS 551 – Section 508 and Accessibility  
 POC for ADS 551 - William Morgan, (571) 218-0829, [wmorgan@usaid.gov](mailto:wmorgan@usaid.gov)

***This is a new ADS chapter.***

## Table of Contents

<b><u>551.1</u></b>	<b><u>OVERVIEW .....</u></b>	<b><u>3</u></b>
<b><u>551.2</u></b>	<b><u>PRIMARY RESPONSIBILITIES .....</u></b>	<b><u>3</u></b>
<b><u>551.3</u></b>	<b><u>POLICY DIRECTIVES AND REQUIRED PROCEDURES .....</u></b>	<b><u>8</u></b>
<b><u>551.3.1</u></b>	<b><u>Background.....</u></b>	<b><u>8</u></b>
<b><u>551.3.1.1</u></b>	<b><u>Section 508 Refresh .....</u></b>	<b><u>9</u></b>
<b><u>551.3.2</u></b>	<b><u>Section 508 and Accessibility.....</u></b>	<b><u>9</u></b>
<b><u>551.3.2.1</u></b>	<b><u>User Needs.....</u></b>	<b><u>9</u></b>
<b><u>551.3.2.2</u></b>	<b><u>Procurement .....</u></b>	<b><u>10</u></b>
<b><u>551.3.2.3</u></b>	<b><u>Software, Operating System, Authoring Tools, and Hardware.....</u></b>	<b><u>10</u></b>
<b><u>551.3.2.4</u></b>	<b><u>Electronic Content .....</u></b>	<b><u>12</u></b>
<b><u>551.3.2.5</u></b>	<b><u>Multimedia .....</u></b>	<b><u>14</u></b>
<b><u>551.3.2.6</u></b>	<b><u>Support Documentation .....</u></b>	<b><u>14</u></b>
<b><u>551.3.2.7</u></b>	<b><u>Exceptions .....</u></b>	<b><u>14</u></b>
<b><u>551.4</u></b>	<b><u>MANDATORY REFERENCES .....</u></b>	<b><u>16</u></b>
<b><u>551.4.1</u></b>	<b><u>External Mandatory References .....</u></b>	<b><u>16</u></b>
<b><u>551.4.2</u></b>	<b><u>Internal Mandatory References .....</u></b>	<b><u>17</u></b>
<b><u>551.5</u></b>	<b><u>ADDITIONAL HELP .....</u></b>	<b><u>17</u></b>
<b><u>551.6</u></b>	<b><u>DEFINITIONS .....</u></b>	<b><u>18</u></b>

## ADS 551 – Section 508 and Accessibility

### 551.1 OVERVIEW

Effective Date: 12/23/2019

This ADS chapter establishes USAID Section 508 policy and assigns administrative responsibilities to the Bureau for Management, Office of the Chief Information Officer (M/CIO) and other departments to ensure that USAID's Information and Communication Technology (ICT) is accessible by the Agency's workforce and members of the public with disabilities. The ADS chapter implements Section 508 of the Rehabilitation Act of 1973 ([29 U.S.C. 794d](#)), as amended by the Workforce Investment Act of 1998, [Public Law 105-220](#), and applies to ICT products and services developed, procured, maintained, or used by USAID. The chapter also applies to all USAID electronic content including, but not limited to electronic files, videos, online training materials, external and internal Agency funded websites, electronic systems, Agency Notices, blogs, and social media.

This chapter applies to all Bureaus, Independent Offices, and Missions (B/IO/Ms), and organizations conducting business for, and on behalf of, USAID through contractual relationships when using USAID IT assets. Throughout the chapter, the terms "workforce" and "individuals" refer to individuals working for, or on behalf of, the Agency, regardless of hiring or contracting mechanism, who have physical and/or logical access to USAID facilities and information systems. This includes but is not limited to United States Direct-Hire employees, Personal Services Contractors, Fellows, Participating Agency Service Agreements, and Contractor Personnel. Contractors are not normally subject to Agency policy and procedures as noted in [ADS 501.1](#). However, contractor personnel are included here by virtue of the applicable clauses in the contract related to Homeland Security Presidential Directive 12 (HSPD-12) and information security requirements.

### 551.2 PRIMARY RESPONSIBILITIES

Effective Date: 12/23/2019

#### a. The **Assistant Administrator for the Bureau for Management (AA/M)**:

- 1) Is responsible for USAID's implementation of, and adherence to, Section 508 standards, regulations, policies, plans, processes, and procedures;
- 2) Submits reports and survey data related to ICT to appropriate government and other oversight organizations; and
- 3) Ensures that staff responsible for acquisition planning and requirements include needs of people with disabilities when developing plans and specifications as defined in [36 CFR part 1194](#).

#### b. The **Bureau for Management, Office of the Chief Information Officer (M/CIO)**:

- 1) Establishes the Agency Section 508 program, providing leadership for the program and appointing an Agency Section 508 Coordinator;
- 2) Incorporates Section 508 accessibility considerations into the planning, operation, and management of any IT that the Agency develops, uses, or maintains; and
- 3) Ensures Section 508 requirements are considered in IT procurement.

**c. The USAID Section 508 Coordinator (M/CIO):**

- 1) Manages USAID's Section 508 program on behalf of the Agency CIO, to include developing and maintaining Agency policies, guidance, and best practices to ensure the Agency implements Section 508 goals and objectives;
- 2) Ensures Section 508 requirements are considered in USAID IT and acquisition life cycle activities, including enterprise architecture, design, development, testing, deployment, and ongoing maintenance activities;
- 3) Grants final approval/disapproval of requests for exemptions, exceptions, and undue burden for all USAID IT systems and procurements;
- 4) Validates IT systems' accessibility prior to deployment;
- 5) Partners with Operational Units (OUs) throughout the Agency to ensure the Agency implements Section 508 goals and objectives;
- 6) Submits USAID's Section 508 Biannual Office of Management and Budget (OMB) Dashboard/Report; and
- 7) Represents the Agency in Section 508 Coordinators' Meetings and Interagency Accessibility Forums.

**d. The Head of each Bureau, Independent Office, or Mission (B/IO/M):**

- 1) Assigns a content owner to electronic documents, systems, and applications developed in the B/IO/M;
- 2) Ensures system owners for newly developed systems complete and submit a USAID System Owner Product Accessibility Template (USAID PAT) to [Section508@usaid.gov](mailto:Section508@usaid.gov) (the System Owner PAT (see USAID Letter of Designation System Owner) is located at: <https://pages.usaid.gov/M/CIO/section-508-compliance>);

- 3) Ensures that all public facing electronic content that is developed by the B/IO/M is accessible to people with disabilities;
- 4) Ensures that B/IO/M developed and maintained electronic content which includes websites, videos, training modules, as well as, data information, USAID official communications, and electronic documents, conform to [Web Content Accessibility Guidelines 2.0 \(WCAG 2.0\)](#);
- 5) Ensures that ICT procured by the B/IO/M is compliant with the accessibility standards developed by the Access Board;
- 6) Ensures the Accessibility Requirements Tool (ART) is used to develop applicable accessibility requirements;
- 7) Provides accessibility requirements generated by using ART to the vendor;
- 8) Ensures that the vendor has conformed to the ART requirements prior to USAID ICT procurement; and
- 9) Ensures all systems and applications, including custom developed applications, meet the [Revised Section 508 Standards](#).

**e.** The **Office of Human Capital and Talent Management, Center for Professional Development (HCTM/CPD)** manages the Agency's Learning Management System (LMS) and Learning Reference Center (LRC) and ensures that training modules contained in the LMS are Section 508 compliant in coordination with OUs that develop the training modules.

**f.** The **Section 508 and Accessibility Subject Matter Expert:**

- 1) Collaborates with the Office of Civil Rights and Diversity (OCRD) to ensure that members of the USAID workforce who require assistive technology (AT) as a form of reasonable accommodation receive appropriate guidance;
- 2) Reviews new information systems to ensure that they meet the requirements in the [Revised Section 508 Standards](#);
- 3) Reviews accessibility tests, scanning Agency applications developed after January 18, 2018 to ensure they are compliant with the [Revised Section 508 Standards](#); and
- 4) Maintains accessibility test records, reviewing test results and validating the applications prior to implementation.

**g. Web Content Developers and Testers:**

- 1) Ensure Section 508 requirements are included throughout the ICT development cycle;
- 2) Ensure all functionality of ICT is accessible to, and usable by, individuals with disabilities, either directly or by using assistive technology;
- 3) Ensure ICT is developed, installed, configured, and maintained to support users with disabilities; and
- 4) Support accessibility scans of the USAID internet and intranet sites in coordination with the Section 508 coordinator.

**h. The Bureau for Management, Office of the Chief Information Officer, IT Operations Division (M/CIO/ITO)** ensures that devices and assistive technology, such as speech recognition software, screen readers, screen magnifiers, reading assistance software, alternative input software, and hardware requested by Agency users with disabilities, are prioritized in the review and approval process, and maintains the confidentiality of all information obtained in connection with reasonable accommodation requests, in accordance with applicable confidentiality and privacy requirements.

**i. The Bureau for Management, Office of the Chief Information Officer, Information and Process Management Division/Enterprise Change Management (M/CIO/IPM/ECM)** ensures that the Software and Hardware Approval Request Panel (SHARP) reviews assistive technology installation requests within seven business days of receipt.

**j. The Bureau for Legislative and Public Affairs (LPA):**

- 1) Ensures that all electronic content, which includes USAID Internet and Intranet websites, USAID official communications, and electronic documents are developed in conformance with [Web Content Accessibility Guidelines 2.0 \(WCAG 2.0\)](#);
- 2) Continuously monitors the preparation and publishing of USAID web pages to ensure all content in USAID web pages is Section 508 compliant. In exceptional circumstances, where there is difficulty in making the web pages accessible, the content owner must contact the Section 508 Coordinator or OCRD for assistance to provide alternative means to access content or a reasonable accommodation;
- 3) Ensures that USAID-produced videos posted on Agency Youtube or social media platforms are closed captioned;

- 4) Ensures that all the multimedia products posted on USAID sites are either open captioned or closed captioned;
  - 5) Conducts initial and on-going accessibility remediation to ensure that any updates to USAID.gov, USAID intranet pages, and Third Party websites comply with the [Revised Section 508 Web Application Standards](#) (LPA and the Agency Section 508 Coordinator will work with content owners of Third Party websites to ensure sites comply with Section 508 requirements);
  - 6) Reviews accessibility scan results in coordination with the M/CIO Section 508 team; and
  - 7) Works to remedy accessibility issues working closely with the Section 508 Coordinator.
- k. The Bureau for Management, Office of Acquisition and Assistance (M/OAA):**
- 1) Ensures ICT procurements are compliant with the Federal Acquisition Regulation (FAR) and Agency policies;
  - 2) Ensures Contracting Officers (COs) collaborate with M/CIO to appropriately incorporate Section 508 requirements in all awards;
  - 3) Ensures Contracting Officers Representatives perform work as delegated by the CO, including monitoring projects and programs, to integrate appropriate Section 508 requirements in requirements documents (Performance Work Statement (PWS), Statement of Work (SOW), Statement of Objectives (SOO), etc.);
  - 4) Ensures that market research is conducted prior to procurement of Section 508-conformant ICT; and
  - 5) Ensures that the appropriate contract clauses ([AAPD 16-02 revised](#)) and Section 508 language is included in contracts.
- I. The Director, Office of Civil Rights and Diversity (OCRD):**
- 1) Coordinates ICT procurement on behalf of disabled staff for reasonable accommodation requests which includes assistive technology (e.g., screen readers, text to speech, screen magnifying software or hardware);
  - 2) Initiates installation and configuration requests on behalf of disabled staff for assistive technology and all software, hardware, and devices;

- 3) Provides sign language interpreters for Agency-wide meetings and conferences;
- 4) Works with M/CIO's Section 508 team to address reasonable accommodation requests; and
- 5) Manages the funding for, and provision of, interpreter services through the Central Fund for Operating Expense (OE)-Funded Reasonable Accommodations.

## 551.3 POLICY DIRECTIVES AND REQUIRED PROCEDURES

### 551.3.1 Background

Effective Date: 12/23/2019

In 1998, the Congress of the United States (U.S.) amended the Rehabilitation Act of 1973, requiring federal agencies to make Information and Communication Technology (ICT) (formerly Electronic and Information Technology (EIT)) accessible to people with disabilities. The law ([29 U.S.C § 794 \(d\)](#)) applies to all Federal agencies when developing, procuring, maintaining, or using ICT. Under Section 508 ([36 CFR Parts 1193 and 1194](#)), agencies must ensure that:

- a. Federal employees with disabilities have access to, and use of, information and data that is comparable to the access and use by Federal employees who are not individuals with disabilities; and
- b. Members of the public with disabilities who are seeking information or data from a Federal agency have access to, and use of, information and data that is comparable to that provided to members of the public who are not individuals with disabilities.

Because compliance to Section 508 is required by law, violations of Section 508 can put the Agency at legal risk.

The purpose of this policy is to ensure access to ICT, which includes information technology and other equipment, systems, technologies, and 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, software, applications, mobile applications, websites, videos, and electronic documents.

Some equipment may contain embedded ICT as an important part of the product, but the primary function of the equipment is not related to ICT, such as an air conditioning system that has a self-monitoring thermostat embedded in the unit, or medical equipment. Such items and equipment are not considered ICT and therefore, are not



covered under Section 508. Some products are ICT but are not addressed by Section 508 Standards, such as cables, power cords, Wi-Fi infrastructure, and fiber optics, and compact discs (CDs) and digital video discs (DVDs) (because content recorded on these products must be accessible).

### **551.3.1.1 Section 508 Refresh**

Effective Date: 12/23/2019

On January 18, 2017, the Architectural and Transportation Barriers Compliance Board (hereafter the Access Board) issued a final rule that revised and updated accessibility standards and requirements covered by Section 508 and [Section 255 of the Communication Act](#). The final rule went into effect on January 18, 2018, updating and reorganizing Section 508 Standards in response to market trends and innovations in technology. Known as the Section 508 “refresh,” it also harmonized these requirements with other guidelines and standards both in the U.S. and abroad, including standards issued by the [European Commission](#) and the [World Wide Web Consortium \(W3C\) Web Content Accessibility Guidelines \(WCAG 2.0\)](#) (a globally recognized voluntary consensus standard for web content and ICT). Compliance with the revised standards is required as of January 18, 2018, except where information and communication technology (ICT) are subject to [safe harbor](#) provisions.

USAID’s implementation of the [Revised Section 508 Standards](#) ensures that people with disabilities in USAID and members of the public have equal access to ICT that is provided to people with no disabilities.

### **551.3.2 Section 508 and Accessibility**

#### **551.3.2.1 User Needs**

Effective Date: 12/23/2019

USAID must identify the needs of users with disabilities when it procures, develops, maintains, or uses ICT to determine how users will perform functions supported by ICT and how ICT will be developed, installed, configured, and maintained to support users with disabilities.

OCRD must work with the M/CIO Section 508 Coordinator to identify users with disabilities and their ICT needs. Once the needs are identified, OCRD and the Section 508 Coordinator initiate a review of the selected equipment through a Software Hardware Approval Request Process (SHARP) request at: [https://usaiditsm.service-now.com/sphome?id=it\\_services3](https://usaiditsm.service-now.com/sphome?id=it_services3).

The SHARP request must include an explanation of how the requestor will use requested ICT and identify if operation and maintenance funds are available to support ongoing costs to maintain the ICT. The SHARP request must identify the specific product and version being requested. The SHARP Request must identify the business benefit need that this software will fulfill.

### 551.3.2.2 Procurement

Effective Date: 12/23/2019

USAID must ensure that ICT procured after January 18, 2018 is compliant with the [Revised Section 508 Standards](#).

Existing ICT (systems, websites, etc.) that were developed or refreshed before January 18, 2018 are acceptable under the Section 508 Safe Harbor Exception (see Section **551.3.2.7.a**). Any substantive changes to existing ICT, such as an update or refresh made after January 18, 2018, must conform to the applicable Section 508 Standards.

B/IO/MS must follow the procurement guidance outlined in [ADS 302mak, USAID Implementation of Section 508 of the Rehabilitation Act of 1973, ADS 302mah, Information Security Requirements for Acquisition of Unclassified Information Technology, and AAPD 16-02 Revised](#).

### 551.3.2.3 Software, Operating System, Authoring Tools, and Hardware

Effective Date: 12/23/2019

USAID must follow the [Revised Section 508 Standards](#) developed by the Access Board. The following are software, operating systems, authoring tools, and hardware standards and exceptions:

#### a. Software

- All software for Agency use, including mobile applications developed or procured by USAID that have user interface components, as well as the content of platforms and applications, must be compliant with interoperability with assistive technology ICT software requirements.
- Software that has user interface components, as well as the content of platforms and applications, must conform to Level A and Level AA Success Criteria and Conformance Requirements in [Web Content Accessibility Guidelines 2.0 \(WCAG 2.0\)](#). WCAG 2.0 Success Criteria are categorized into three levels. Level A covers basic accessibility features; Level AA handles the biggest and most common barriers for disabled users; and Level AAA has the highest level of accessibility features. All Federal agencies are required to meet WCAG 2.0 Level A and Level AA Success Criteria. The following are some of the Software Success Criteria:
  - 1) Keyboard accessibility with no exception (Level A)
  - 2) Focus Visible (Level A)
  - 3) Name, Role, Value (Level AA)
  - 4) Consistent Identification (Level AA)

- 5) Images of Text (Level A)
  - 6) Pause, Stop, Hide (Level AA)
  - 7) Use of Color (Level A)
  - 8) Contrast (text and images of text have a contrast ratio of at least 4.5:1). Large scale text and images of large text have a contrast ratio of at least 3:1.
    - a. Three Flashes or Below Threshold (blinking, scrolling images does not flash more than three times in any one second period) (Level A)
    - b. On Focus (Level A)
    - c. On Input (Level A)
    - d. Error Identification (Level AA)
    - e. Labels or Instructions (Level AA)
- Exceptions
    - 1) Software that is Assistive Technology that supports accessibility of the platform does not need to conform to the software standards; and
    - 2) Non-web software is not required to conform to the following four requirements in WCAG 2.0: bypass blocks, multiple ways, consistent navigation, and consistent identification.

## **b. Operating Systems**

- Operating systems such as platform software (e.g., desktop operating systems; embedded operating systems, including mobile systems; and web browsers) must provide user control over platform features that are defined in platform documentation as accessibility features.
- Software must not disrupt platform features that are defined in the platform documentation as accessibility features, such as user control of accessibility features.
- Platform software and software tools that are provided by the platform developer must provide a documented set of accessibility services that

support applications running on the platform to interoperate with assistive technology.

- Platform software must permit user preference from platform settings for color, contrast, font type, font size, and focus cursor.

### c. Authoring Tools

An authoring tool is any software or collection of software components that can be used by authors, alone or collaboratively, to create or modify content for use by others, including other authors. The following are the standards that must be met:

- Authoring tools must provide a mode of operation to create or edit content to meet level A and AA success criteria and conformance requirements in WCAG 2.0 for all supported features and, as applicable, to file formats supported by the authoring tool.
- Authoring tools must permit the authors the option of overriding information required for accessibility.
- Authoring tools must, when converting content from one format to another or saving content in multiple formats, preserve the information required for accessibility to the extent that the information is supported in the destination format.
- Templates: Where templates are provided, they must allow content creation that conforms to Level A and Level AA success criteria. Conformance requirements in WCAG 2.0 must be provided for a range of template uses for supported features and, as applicable, to file formats supported by the authoring tool.

### d. Hardware

The components of telecommunications equipment and customer premises equipment (such as telephone, routers, switches, network adaptors, etc.) are hardware, and transmit information or have a user interface. Those components must conform to the applicable requirements in the [Revised Section 508 Standards](#). Detailed hardware standards and requirements can be found on the [Access Board's](#) site.

#### 551.3.2.4 Electronic Content

Effective Date: 12/23/2019

LPA must ensure that electronic content that is created or updated and available to the public on or after January 18, 2018, including web pages, blogs, and social media posts, conforms to the [Revised Section 508 Standards](#).

LPA and B/IO/Ms must ensure that the electronic content created or updated for official Agency communications on or after January 18, 2018, including content posted to the Agency Intranet, conforms to the applicable Section 508 Standards. This requirement applies to the following types of official USAID communications:

- Emergency notifications;
- Initial or final decision adjudicating an administrative claim or proceedings;
- Internal or external program or policy announcement;
- Notice of benefits, program eligibility, employment opportunity, or personal action;
- Formal acknowledgment of receipt;
- Template or form; and
- Educational or training material.

#### **a. Testing**

- All electronic content developed or updated after January 18, 2018 must be independently tested using a M/CIO-approved accessibility scanning tool by the USAID Accessibility team.
- Accessibility scan results will be categorized as Critical, Serious, Fair and Good. Critical accessibility issues must be resolved immediately, followed by serious accessibility issues and fair issues.
- Scan results must be tracked, and accessibility issues identified and released for developers to remediate all accessibility errors.
- Manual testing may be needed when there is difficulty identifying the usability of the application.

#### **b. Evaluation and Validation**

- All electronic content that is tested for the first time by the USAID Accessibility team using the M/CIO approved accessibility scanning tool must be tested again after remediation of accessibility issues.
- Second scan results must be tracked and evaluated before electronic content goes to final production.

- The M/CIO/IA Accessibility team must validate electronic content after the evaluation.

### **551.3.2.5 Multimedia**

Effective Date: 12/23/2019

Effective January 18, 2018, all training and multimedia productions which support the Agency's mission, regardless of format, that contain speech or other audio information necessary for the comprehension of the content, must be closed captioned. This requirement applies to any new content or any changes, technological or content-based, made to existing content after the effective date.

All training and informational video and multimedia productions must be audio-described, including but not limited to online training materials uploaded to LMS which support the Agency's mission, regardless of format, that contain visual information necessary for the comprehension of the content. Audio description is narration added to the soundtrack to describe important visual details that cannot be understood from the main soundtrack alone. Audio description of video provides information about actions, characters, on-screen text, scene changes, and other visual content. Audio description is also called "video description" and "descriptive narration."

Display and presentation of alternate text or audio descriptions must be user-selectable, such as the capability to turn the audio description on or off. This usually happens in videos that have no audio.

All media controls must be keyboard accessible.

### **551.3.2.6 Support Documentation**

Effective Date: 12/23/2019

All ICT procured, maintained, developed, or used by USAID must list and explain how to use the accessibility and compatibility features (e.g., <https://www.usaid.gov/accessibility>). The list must include accessibility features that are built-in and accessibility features that provide compatibility with assistive technology such as screen reader, magnifier, speech to text software, etc. Documentation in electronic format, including web-based self-service support, must conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0.

### **551.3.2.7 Exceptions to 508 Requirements**

Effective Date: 12/23/2019

ICT systems or products that provide direct service to the public or to Federal employees must be accessible to people with disabilities, unless a formal request for an exception from a specific Section 508 standard is requested and granted as an approved exception in accordance with established USAID procedures. The USAID Section 508 Coordinator is responsible for making the final determination of whether an

exception is granted or denied. The supervisor of the requesting individual must submit an official exception request via email to [Section508@usaid.gov](mailto:Section508@usaid.gov) with a detailed business case that explains why the exception is necessary and includes an alternative means to provide access to individuals with disabilities. The following describes ICT exception types and alternative means for providing access to people with disabilities:

#### a. ICT Exception Types

- Legacy of ICT/Safe Harbor – The [Revised Section 508 Standards](#) include a safe harbor provision for existing (*i.e.*, legacy) ICT. Under this safe harbor, unaltered, existing ICT (including content) that complies with the existing Section 508 Standards that was procured, developed, maintained, or used by USAID before January 18, 2018, that conforms to the original Section 508 Standards is not required to be modified to comply with the Revised Section 508 Standards. This provision only applies to the component(s) of the ICT determined to be compliant, and only to the extent that such components of the ICT are not altered.
- Maintenance/Monitoring Spaces – Status indicators and operable parts for ICT that are located in space frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment are not required to conform to the [Revised Section 508 Standards](#).
- Undue Burden – “Undue burden” has been defined as “significant difficulty or expense.” The exception for undue burden is only applicable to the specific functions or features of ICT products that cannot be made accessible without imposing significant difficulty or expense on the Agency or component of the Agency that will use the ICT. An example of undue financial burden would be when making the ICT fully compliant would constitute up to ten percent of the Agency’s entire budget. The USAID Section 508 Coordinator works with OCRD to make the final determination on whether conformance to specific requirements of the [Revised Section 508 Standards](#) would impose an undue burden on the Agency. This determination must be in writing and must include an explanation of the basis for the decision, including why, and to what extent, conformance to specific requirements would result in an undue burden on USAID.
- Fundamental Alteration – The USAID Section 508 Coordinator must review requests for and make a determination that conformance to the [Revised Section 508 Standards](#) would fundamentally alter the nature of a specific ICT product. This determination must be in writing and must include an explanation of the basis for the decision, including how conformance would fundamentally alter the nature of the product.

- National Security Systems – [Revised Section 508 Standards](#) do not apply to ICT operated by agencies as a part of national security systems. National security systems are fully exempted.

## b. Alternative Means

When the USAID Section 508 Coordinator makes a determination that an exception to the Section 508 standards is appropriate, USAID must provide access to the information and data to people with disabilities by alternative means. M/CIO and OCRD must identify, in advance, the needs of people with disabilities affected by each exception and implement a plan to meet these needs through alternative means.

Alternative means may include assistive technology or different technologies and reasonable accommodations. Examples include, but are not limited to voice, fax, relay service, Text Telephone (TTYs), qualified sign language interpreters, Internet posting, captioning, text-to-speech synthesis, screen readers, personal assistants, or audio descriptions.

For accessibility-related or additional questions, please contact [Section508@usaid.gov](mailto:Section508@usaid.gov).

For multimedia captioning service, please contact LPA at [multimediacaptioningservice\\_LPA@usaid.gov](mailto:multimediacaptioningservice_LPA@usaid.gov).

For parking and vehicle assistance, please contact OCRD at [reasonableaccommodations@usaid.gov](mailto:reasonableaccommodations@usaid.gov).

## 551.4 MANDATORY REFERENCES

### 551.4.1 External Mandatory References

Effective Date: 12/23/2019

- [29 CFR Part 32, Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving Federal Financial Assistance](#)
- [Information and Technical Assistance on the Americans with Disabilities Act \(ADA\)](#)
- [Office of Management and Budget \(OMB\) Circular A-130, "Managing Information as a Strategic Resource"](#)
- [Public Law 105-220, "Section 508 of the Rehabilitation Act of 1973, as amended in the Workforce Reinvestment Act of 1998"](#)
- [Public Law 105-220, Workforce Investment Act of 1998, Amendment to Section 508 of the Rehabilitation Act \(29 USC 794d\)](#)



- f. [Section 504 of the Rehabilitation Act of 1973, as amended](#)
- g. [Section508.gov](#)
- h. [Title 36, Code of Federal Regulations \(CFR\), Part 1194, “Electronic and Information Technology \(EIT\) Accessibility Standards”](#)
- i. [Title 40, U.S.C., 11101 \(6\), “Clinger-Cohen Act of 1996”](#)
- j. [Title 44, U.S.C., § 3501, “E-Government Act of 2002“](#)
- k. [WorldWide Web Consortium \(W3C\) Web Content Accessibility Guidelines 2.0 \(WCAG 2.0\)](#)

#### 551.4.2 Internal Mandatory References

Effective Date: 12/23/2019

- a. [AAPD 16-02 \(Revised\) Clauses And Special Contract Requirements For Facilities Access, Security, And Information Technology \(IT\)](#)
- b. [ADS 110, Equal Employment Opportunity](#)
- c. [ADS 111, Procedures for Providing Reasonable Accommodation for Individuals with Disabilities](#)
- d. [ADS 302mah, Information Security Requirements for Acquisition of Unclassified Information Technology](#)
- e. [ADS 302mak, USAID Implementation of Section 508 of the Rehabilitation Act of 1973](#)
- f. [Federal Regulations – Section 508 \(501mad\)](#)

#### 551.5 ADDITIONAL HELP

Effective Date: 12/23/2019

- a. **Revised Section 508 Applicability Checklist** (located on USAID System Development Life Cycle ([SDLC](#)) [Artifacts Site](#))
- b. **Revised Section 508 Exception Checklist** (located on USAID [SDLC Artifacts Site](#))
- c. **System Owner Product Accessibility Template** (see USAID Letter of Designation System Owner on the <https://sites.google.com/a/usaaid.gov/artifact-templates/>, under Waterfall - 002 - Planning and Requirements

## 551.6 DEFINITIONS

Effective Date: 12/23/2019

See the [ADS Glossary](#) for all ADS terms and definitions.

### **accessibility requirements tool (ART)**

A step-by-step guide to help you easily identify relevant accessibility requirements from the [Revised 508 Standards](#), and incorporate them into your procurement and contracting documentation, as well as in-house IT development. (Chapter 551)

### **alteration**

A change to existing ICT that affects interoperability, the user interface, or access to information or data. (Chapter 551)

### **application**

Software designed to perform, or to help the user to perform a specific task or tasks. (Chapter 551)

### **assistive technology (AT)**

Any item, piece of equipment, or product system, whether acquired commercially, modified, or customized, that is used to increase, maintain, or improve functional capabilities of individuals with disabilities. (Chapter 551)

### **audio description**

Narration added to the soundtrack to describe important visual details that cannot be understood from the main soundtrack alone. Audio description is a means to inform individuals who are blind or who have low vision about visual content essential for comprehension. Audio description of video provides information about actions, characters, scene changes, on-screen text, and other visual content. Audio description supplements the regular audio track of a program. Audio description is usually added during existing pauses in dialogue. Audio description is also called “video description” and “descriptive narration.” (Chapter 551)

### **authoring tool**

Any software or collection of software components that can be used by authors, alone or collaboratively, to create or modify content for use by others, including other authors. (Chapter 551)

### **content**

Electronic information and data, as well as the encoding that defines its structure, presentation, and interactions. (Chapter 551)

### **customer premises equipment (CPE)**

Equipment used on the premises of a person (other than a carrier) to originate, route, or terminate telecommunications service or interconnected VoIP service, including software integral to the operation of telecommunications function of such equipment.

Examples of CPE are telephones, routers, switches, residential gateways, set-top boxes, fixed mobile convergence products, home networking adaptors and Internet access gateways which enable consumers to access communications service providers' services and distribute them around their house via a Local Access Network (LAN). **(Chapter 551)**

**document**

Logically distinct assembly of content (such as a file, set of files, or streamed media) that functions as a single entity rather than a collection; is not part of software; and does not include its own software to retrieve and present content for users. Examples of documents include, but are not limited to, letters, email messages, spreadsheets, presentations, podcasts, images, and movies. **(Chapter 551)**

**existing ICT**

ICT that has been procured, maintained or used on or before January 18, 2018. **(Chapter 551)**

**hardware**

A tangible device, equipment, or physical component of ICT, such as telephones, computers, multifunction copy machines, and keyboards. **(Chapter 551)**

**information and communication technology (ICT)**

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; software; applications; websites; videos; and electronic documents. **(Chapter 551)**

**keyboard**

A set of systematically arranged alphanumeric keys or a control that generates alphanumeric input by which a machine or device is operated. A keyboard includes tactilely discernible keys used in conjunction with the alphanumeric keys if their function maps to keys on the keyboard interfaces. **(Chapter 551)**

**platform accessibility services**

Services provided by a platform enabling interoperability with assistive technology. Examples are Application Programming Interfaces (API) and the Document Object Model (DOM). **(Chapter 551)**

**platform software**

Software that interacts with hardware or provides services for other software. Platform software may run or host other software and may isolate them from underlying software or hardware layers. A single software component may have both platform and non-platform aspects. Examples of platforms are desktop operating systems; embedded

operating systems; including mobile systems, web browsers, plug-ins to web browsers that render a particular media or format and sets of components that allow other applications to execute, such as applications which support macros or scripting. **(Chapter 551)**

**public facing**

Content made available by an agency to members of the general public. Examples include, but are not limited to, an agency website, blog post, or social media pages. **(Chapter 551)**

**revised section 508 standards**

The standards for ICT developed, procured, maintained, or used by agencies subject to Section 508 of the Rehabilitation Act as set forth in 508 Chapters 1 and 2 (36 CFR part 1194, Appendix A), and Chapters 3 through 7 (36 CFR part 1194, Appendix C). **(Chapter 551)**

**software**

Programs, procedures, rules, and related data and documentation that direct the use and operation of ICT and instruct it to perform a given task or function. Software includes, but is not limited to, applications, non-web software, and platform software. The set of user programs running on a system that are designed to be updated often. **(Chapter 547, 551)**

**web page**

A non-embedded resource obtained from a single Universal Resource Identifier (URI) using HyperText Transfer Protocol (HTTP) plus any other resources that are provided for the rendering, retrieval, and presentation of content. **(Chapter 551)**

551\_122319