



PRACTICES GUIDE

SECTION 508 COMPLIANCE

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Document Purpose

This Practices Guide is a brief document that provides an overview describing the best practices, activities, attributes, and related templates, tools, information, and key terminology of industry-leading project management practices and their accompanying project management templates.

Background

The Department of Health and Human Services (HHS) Enterprise Performance Life Cycle (EPLC) is a framework to enhance Information Technology (IT) governance through rigorous application of sound investment and project management principles, and industry best practices. The EPLC provides the context for the governance process and describes interdependencies between its project management, investment management, and capital planning components. The EPLC framework establishes an environment in which HHS IT investments and projects consistently achieve successful outcomes that align with Department and Operating Division goals and objectives.

Section 508 Compliance is a required activity of any Federally-conducted program. The Section 508 Compliance Artifact is developed during the Design Phase of EPLC and is a component of the Design Document. "Section 508" refers to Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d), which requires Federal agencies to develop, procure, maintain, or use electronic and information technology that is accessible to Federal employees and members of the public with disabilities.

Practice Overview

Section 508 (29 U.S.C. § 794d) requires Federal agencies to provide employees and members of the public with disabilities access to electronic and information technology that is comparable to the access available to individuals without disabilities. The law applies to all Federal agencies when they develop, procure, maintain, or use electronic and information technology (EIT).

Achieving and maintaining Section 508 compliance requires project team consideration throughout the project lifecycle during IT project design, development, procurement, or implementation activities.

Practice Best Practices

Section 508 Compliance information is available on the HHS website as follows:

- The HHS Office on Disability HHS 508 Policy website (<http://www.hhs.gov/od/508policy>) provides a link to the HHS level policy and also has links to other relevant HHS communication and Acquisitions Guidance, most comprehensively at <http://www.hhs.gov/web/508/index.html>.
- The Section 508 Coordinators, Officials, and Other Public Contacts website (<http://www.hhs.gov/od/508coordinators>) lists OPDIV coordinators and other officials who are directly responsible for Section 508 activities across HHS.
- The HHS Section 508 Evaluation Template Product Accessibility Template (PAT) website (<http://www.hhs.gov/od/vendors>) provides information on the requirements for vendors involved in Section 508-related products and services and also provides information on completing the Product Assessment templates and links to relevant federal laws, policies, and regulations. By documenting that the IT solution developed, procured, maintained, or used is conformant with the technical standards, a Federal agency/Federally-conducted program is showing a record of complying with Section 508 of the Rehabilitation Act of 1973.

- The Section 508: General Information website (<http://www.hhs.gov/web/508>) provides information on website content accessibility. It includes links to guidance, compliance, standards, and policy information. There are also checklists for compliance of different document formats. In addition links in the left-hand column provide additional information on topics such as compliance and remediation, training, and points of contact.
- The HHS Tools website (<http://www.hhs.gov/web/tools/index.html>) includes contact information for the Accenture Digital Diagnostics compliance monitor that may be used to check a website's conformance for Section 508 technical standards. Tools such as Accenture can test websites the detection of broken links, spelling errors slow loading pages, and other problems that affect website usability and accessibility. It should be noted that more comprehensive and meaningful testing for accessibility requires the use of methods in addition to automated tools (which can and do give false readings), such as the use of actual use of assistive technology, e.g., JAWS and/or the inclusion of persons with disabilities during development and testing stage.
- The GSA-sponsored Section508 website (<http://section508.gov>) provides information at the federal level on Section 508 laws and applicable EIT standards developed by the U.S. Access Board, and serves as the location for information and access to the BuyAccessible Wizard, a menu driven program that assists federal staff to conduct their market research on accessible EIT products and services that meet 508 acquisition requirements.

Practice Activities

For software development, COTS, and other IT projects, the following practice activities are appropriate:

- **Incorporate Section 508 compliance requirements** – Ensure project includes high level compliance requirements into the design, development, procurement and use of the IT solution.
- **Test** – Develop and execute a testing plan utilizing available tools.
- **Implement** – Implement any required changes.
- **Review** – Re-evaluate compliance whenever changes or updates are made.