



508 Refresh

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Overview

- Who and what is the Access Board?
- 508 Refresh Status
- Trends in Web Accessibility Standards
- 2012 DOJ Report
- Questions?



Access Board Overview

- Architectural Transportation and Compliance Board, 1973
 - Independent Micro-Agency (28 staff)
- 25 Board Members
 - 13 Public Presidential Appointees
 - 12 Senior Federal Agencies Representative
- Develop and maintain design criteria
 - Built Environment
 - Transit Vehicles
 - Telecommunications Equipment
 - ***Electronic and Information Technology***
- Provide Technical Assistance and Training



Access Board Authority

- Built Environment
 - Architectural Barriers Act
 - Federal Buildings and Post Offices
 - ADA is enforced by DoJ
 - Common design criteria
- Communications
 - Section 255 of Telecommunication Act
 - Telecommunications Act Accessibility Guidelines
 - Section 508 of the Rehabilitation Act
 - ***Electronic and Information Technology Accessibility Standards***



508 Refresh Big Picture

- Big Change:
 - More Documents, More of the Time, for More People
 - Full scope TBD
- What are some expectations for accessible electronic documents?
 - Using WCAG 2.0 Success Criteria as benchmark
 - <http://www.w3.org/TR/WCAG/>



508 History

- 1973 Rehabilitation Act
- 1998 Workforce Investment Act
 - Access Board charged with developing standards
 - FAR for procurement enforcement
- Standards published December 20, 2000
 - Enforceable June 21, 2001



What's wrong with current 508?

- Product categorization obsolete
 - Convergence of technology
 - Smart phone is software, web, telecom, multimedia, closed, and a portable computer!
 - New technologies
 - E.g., VoIP, Real Time Text, directly accessible touch screens
- Some parts terribly inadequate
 - Documents covered, but provision are HTML-centric
 - Many provisions actually performance standards
- Some parts actually harmful
 - Web pages required to work without CSS — even though CSS is well supported and accessible!



Current Work

- TEITAC
 - September 27, 2006 — April 3, 2008
- ANPRM
 - March 22, 2010
- 2nd ANPRM
 - December 8, 2011.
 - Public comment period
 - Two public hearings were held.
 - Ninety-one commenters



General Observation

- Overall, commenters supportive
- Generally approved of
 - the streamlined approach to the text
 - the direct reference to WCAG 2.0
 - the improved detail and clarity of the scoping provisions
- Concerns
 - Length of the rulemaking process
 - Use of the WCAG 2.0 Success Criteria for electronic documents and applications
 - Relationship between the FPC and the technical provisions
 - Limiting coverage



Current & Future Work

- Completed review of the comments
- ad hoc Board committee
 - Board Members
 - Staff
 - SME representatives from other federal agencies
- Regulatory assessment
 - Econometrica
- Revise draft text and preamble based on a regulatory analysis
- Board Vote
 - Anticipate submitting package, Board Meeting March 13, 2013
- NPRM submitted to OMB



Applying WCAG 2.0 to Non-Web ICT

- W3C formed WCAG2ICT Task Force
 - <http://www.w3.org/WAI/GL/WCAG2ICT-TF/>
 - April, 2012
- W3C Working Draft 27 July 2012
 - <http://www.w3.org/TR/wcag2ict/>
 - Early version, and not complete
 - On track to be published as a “Note”
 - Non-normative guidance
 - not a “recommendation”, not a “standard”
- Background documents
 - Task force wiki
 - <http://sites.google.com/site/wcag2ict/>
 - Editor’s Draft
 - <http://www.w3.org/WAI/GL/wcag2ict/>
 - expected to be updated “real soon now”
 - Public comments
 - <http://lists.w3.org/Archives/Public/public-wcag2ict-comments/>



What to do now?

- Agencies should be thinking ahead to when a final rule is issued.
- Agencies should begin to get familiar with WCAG 2.0.
- Besides our rulemaking, there is a movement toward a more universal web accessibility standard:
 - Web Content Accessibility Guidelines (WCAG) 2.0
 - W3C standard finalized in December 2008



EU Mandate 376

- The European Union is moving toward adoption of WCAG 2.0
 - <http://www.mandate376.eu/>
- Three European standards organizations to harmonize
 - CEN
 - CENELEC
 - ETSI
- Charge to facilitate the public procurement of accessible information and communication technologies (ICT) products and services within Europe
- Final standard for targeted for February 2014
 - Recent draft July 31, 2012
 - Draws closely from
 - “Final” draft due December 5, 2012
 - Long public inquiry period



Department of Justice

- Accessibility of Web Information and Services of State and Local Government Entities and Public Accommodations
 - ANPRM July 2010
 - Asked question about which standards to use: WCAG 2.0 or Section 508 standards?
 - Overwhelming response favoring WCAG
- Links:
 - <http://federalregister.gov/a/2010-18334>
 - <http://www.regulations.gov/#!docketDetail;D=DOJ-CRT-2010-0005>



Department of Transportation

- Non-Discrimination on the Basis of Disability in Air Travel: Accessibility of Web Sites and Automated Kiosks at U.S. Airports
 - NPRM September 26, 2011
 - U.S. and foreign carriers marketing air transportation to the general public in the U.S.
 - WCAG 2.0 Level Double A
- Links:
 - <http://www.regulations.gov/#!docketDetail;D=DOT-OST-2011-0177>
 - <http://regulationroom.org/air-travel-accessibility/agency-documents/snprm/>



Health and Humans Services

- HHS Office of the National Coordinator for Health Information Technology
 - September 2012
 - Interim Final Rule
 - Initial Set of Standards, Implementation Specifications, and Certification Criteria for Electronic Health Record Technology
 - Adopted WCAG 2.0 Level A as the standard for meaningful use criteria for patients to view and download their health information
- Links:
 - <http://www.hhs.gov/news/press/2012pres/08/20120823b.html>
 - <http://federalregister.gov/a/2012-20982>



2012 DOJ Report

- Any follow-up activity planned by the Board based on the DOJ survey results?
 - Working closely with the White House, OMB, and the CIO accessibility committee on the development of a strategic plan for better implementation of section 508
 - September 2012 DOJ Section 508 Report to the President and Congress



General Processes for Section 508 Implementation

- Establish Section 508 Policies and Procedures
- Appoint Coordinators and Establish Section 508 Offices or Programs
- Provide More Training to Agency Personnel
- Ensure Accessibility of EIT Used in Programs or Activities Receiving Federal Financial Assistance



Procurement

- Develop Procurement Policies for Section 508 Compliance
- Use Specific Language of the Section 508 Requirements in All Solicitations
- Perform Actual Product Testing
- Establish Procedures to Document Section 508 Procurement Decisions



Administrative Complaints and Civil Actions

- Establish Procedures Specifically to Process Section 508 Complaints
- Incorporate Alternative Dispute Resolution Into Section 508 Complaint Process
- Disseminate Widely Information About the Section 508 Complaint Process



Website Compliance

- Establish Web Accessibility Policies and Procedures
- Ensure that Web Accessibility Policies and Procedures Include Special Topics
- Test Accessibility of Agency Web Pages
- Publish Web Accessibility Statements
- Publish E-Mail Addresses



Inter- and Intra-Agency Coordination

- Revive the Interagency Disability Coordinating Council
- Issue Section 508 Model Complaint Resolution Policies and Procedures
- Issue Guidance Clarifying the Relationship Among Sections 501, 504, and 508 of the Rehabilitation Act



Contact us

- Want more information?
 - 800-872-2253 (voice)
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Nobel Reasons for Accessibility

- It is the right thing to do
- Supports employment of people with disabilities
- Improves public access to government IT services
- Reduces the need for individual accommodations
- Encourages improvements in accessible design
- Increases availability of accessible products
- Raises general awareness of disability issues
- Government work often disproportionately affects people with disabilities
 - Goal to encourage broadest public input



Selfish Reasons for Accessibility

- Search Engine Optimization
 - High correlation between accessibility and machine readability
- Optimized Mobile Experience, 2 for 1
 - Your Wealthier Customers
 - Overlap between what is needed for mobile and accessibility
- Lower TCO
 - Maintenance, Upgrading, Future Proofing
 - Good synergy between usability and accessibility
- Avoiding Expensive or Embarrassing Lawsuits
 - ADA requires “effective communication” and “program access”
 - Adding accessibility after the fact can cost as much as whole project!
- The Buying Power of People with Disabilities
- What Will The Web Be Like When I’m 65?
- Nobody Plans to be Disabled
- Would You Like Fries With That Inaccessible Web Page?

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