United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

TAKE PRIDE IN AMERICA

APR 28 2008

Memorandum

To: Assistant Secretaries
Heads of Bureaus and Offices

From: Michael J. Howell
Chief Information Officer

Subject: Release of New Section 508 Awareness Computer-Based Training (CBT)

Purpose

Section 508 of the U.S. Rehabilitation Act of 1973 directs all Federal agencies that are developing, procuring, maintaining, or using Electronic and Information Technology (E&IT) to ensure that this technology is accessible to employees and members of the public. To facilitate this requirement, Department of Interior (DOI) personnel involved in the acquisition process of E&IT are required to complete the training titled, "Section 508 Awareness" no later than September 30, 2008.

Background:

On November 6, 2007, the Office of Management and Budget (OMB) issued a memorandum reminding Chief Acquisition Officers (CAOs) and Chief Information Officers (CIOs) of their collaborative roles in the area of Section 508 and to suggest activities and tools to help agencies fulfill their responsibilities in implementing the law. Specifically, CAOs and CIOs were reminded to review their procurement and information technology acquisition policies and procedures to validate that Section 508 standards are appropriately considered and clearly stated in solicitation documents (Attachment 1).

The Office of the Chief Information Officer (OCIO) has released a new CBT module on Section 508 Awareness. The OCIO developed this standard Department-wide course, which is available through DOI LEARN, the Department's enterprise-wide learning management system.

Completion of this training module will educate DOI employees on the importance of developing, procuring, maintaining, or using accessible E&IT. Through its training initiatives, DOI will meet the statutory Section 508 requirements and will assume a best practice and leadership role in this arena.

Scope:

This memorandum applies specifically to CIOs, Chief Financial Officers (CFOs), Section 508 Coordinators, Contracting Officers, Contracting Officers Technical Representatives (COTRs), Acquisition Managers, Human Resources Representatives, Information Technology (IT) Managers, Training Managers, Scientists, employees and contractors involved in the acquisition process, and other DOI employees as deemed necessary by management.

Due Dates:

Given the importance of this training, we are requesting that the aforementioned individuals comply with this requirement no later than September 30, 2008, in order to ensure the acquisition of accessible E&IT before the beginning of FY 2009.

Completion of the CBT should take approximately one hour. The training is provided online via the DOI LEARN system for those individuals with Internet access. The training is provided via the Intranet and via CDs for those individuals without Internet access. Bureau/Office Section 508 Coordinators are responsible for working with their respective DOI LEARN Managers to track completion percentages and to modify the scope of bureau/office personnel required to complete this training.

Contacts:

If you have any questions concerning this memorandum, please contact Sid Sharma at (202) 219-0963 or your bureau/office Section 508 coordinator (Attachment 2). Staff may also contact their bureau/office DOI LEARN Manager (Attachment 3). Technical issues related to DOI LEARN or the course can be directed to the DOI LEARN help desk via email at doilearn@golearning.com or by phone at (866) 466-1998.

Attachment 1 – November 6, 2007 OMB Memorandum
Attachment 2 – Bureau/Office Section 508 Coordinator Contact List
Attachment 3 – Bureau/Office DOI LEARN MANAGER Contact List

cc: Departmental Chief Information Officers

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

OFFICE OF FEDERAL
PROCUREMENT POLICY

November 6, 2007

MEMORANDUM FOR CHIEF ACQUISITION OFFICERS AND
CHIEF INFORMATION OFFICERS

FROM: Paul A. Denett
Administrator for Federal Procurement Policy

Karen S. Evans
Administrator, Office of E-Government and
Information Technology

SUBJECT: Ensuring the Accessibility of Federal Electronic and Information Technologies Procured by Federal Agencies

Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d) requires Federal agencies to purchase electronic and information technologies (E&IT) that meet specific accessibility standards. This law helps to ensure that Federal employees with disabilities have access to, and use of, the information and data they need to do their jobs, which reduces barriers to job success and mobility. The law also helps to ensure that members of the public with disabilities have the ability to access government information and services. The purpose of this letter is to remind Chief Acquisition Officers (CAOs) and Chief Information Officers (CIOs) of their collaborative roles in this area and to suggest activities and tools to help agencies fulfill their responsibilities in implementing the law.

The Federal Acquisition Regulation (FAR) requires agencies to acquire accessible E&IT unless an exception applies and is documented. Consideration of the Section 508 standards must be part of the procurement planning process, market research, and requirements definition, and the standards must be included in all applicable solicitations. The General Services Administration (GSA), as part of their statutory requirement to provide technical support for Section 508, assesses the extent to which agencies properly include applicable Section 508 standards using a sampling process of solicitations posted on FedBizOpps over the past few months. Across all agencies, a recent assessment by GSA showed that only 3% of the solicitations that included E&IT properly included the Section 508 standards. While some of the solicitations sampled included references to Section 508, a compliant document must, among other requirements, articulate the specific 508 standards that apply to that solicitation.

These results demonstrate we are not adequately incorporating applicable Section 508 standards when acquiring E&IT. CAOs and CIOs should review their procurement and information technology acquisition policies and procedures to validate that the Section 508 standards are appropriately considered and clearly stated in solicitation documents. CAOs should consider sampling agency procurements that include E&IT to ensure they properly

specify the appropriate Section 508 standards. Procurements that do not meet the standards should be amended. The attachment includes the assessment criteria that GSA uses, and CAOs should consider using these or similar criteria in their sampling effort.

CIOs also have specific obligations to help ensure the applicable Section 508 standards are included in procurements for E&IT. Section 8(b)(xiii) of OMB Circular A-130, "Management of Federal Information Resources," requires agencies to ensure selected systems or processes facilitate accessibility under the Rehabilitation Act of 1973, and CIOs are responsible for monitoring agency implementation.[1] Additionally, Sections 53 and 300 of OMB Circular A-11, "Preparation, Submission, and Execution of the Budget," instruct agencies to ensure IT capital planning and control comply with Section 508 requirements.[2] CIOs should instruct agency project managers to review capital planning and investment control documentation for compliance with Section 508.

As part of its ongoing technical assistance and sampling activities, GSA's Office of Information Technology Accessibility and Workforce may contact your Section 508 coordinator and the points of contact listed in solicitations that appear not to be compliant to offer additional assistance.

A resource available to agencies is the Buy Accessible Wizard at www.buyaccessible.gov. This free tool guides requiring officials through the steps necessary to conduct acquisitions that comply with Section 508. CAOs and CIOs may incorporate the use of this tool into their procurement procedures to improve compliance with the law. Another resource is www.Section508.gov, which has information and free on-line training courses.

When properly implemented, Section 508 improves the accessibility of government information and data and ensures government E&IT is accessible to Federal employees and citizens with disabilities. Building an accessible infrastructure creates an environment for hiring persons with disabilities.

If you have any questions about Section 508 acquisition policies, please contact Lesley Field at the Office of Federal Procurement Policy on (202) 395-4761. If you have any questions regarding the Buy Accessible Wizard or require other technical assistance, please call Terry Weaver, Director, Information Technology Accessibility and Workforce Division at GSA on (202) 501-4906.

Attachment

cc: Senior Procurement Executives

---

[1] OMB Circular A-130, "Management of Federal Information Resources," can be found at: http://www.whitehouse.gov/omb/circulars/a130/a130trans4.pdf.

[2] OMB Circular A-11, "Preparation, Submission, and Execution of the Budget," can be found at: http://www.whitehouse.gov/omb/circulars/a11/current_year/a_11_2007.pdf.

Attachment

Section 508 Compliance Evaluation of Solicitations –
Suggested Assessment Criteria

All solicitations are first assessed to determine if they include electronic and information technologies (E&IT). For those solicitations that do include E&IT-related deliverables (products, labor hours, or information content), all available documents are reviewed to see if Section 508 requirements or other accessibility factors are addressed in these documents. The solicitation is then scored as follows:

1. If no mention of Section 508 is found, the solicitation is scored as red*.

2. Solicitations that mention Section 508 requirements apply generally to product, labor hour or information content deliverables are scored as yellow.

3. When broad sections and/or specific provisions of the Access Board Standards are included, the solicitation is scored as green. Solicitations that claim a Section 508 exception are also scored as green if the documentation provides a coherent rationale for the exception.

*Note – Any applicable exceptions are not assumed. While these are rare, the possibility exists that some solicitations marked red have valid exceptions. Solicitations that included documented exceptions were scored green.

Although not specifically required, including any applicable exceptions in solicitations is a best practice that shows that the 508 Standards were considered by the requiring official.

Resources: The BuyAccessible Wizard at www.buyaccessible.gov and the BuyAccessible Glossary found at that site can be used as references when preparing and reviewing solicitations. General Section 508 information is always available at www.Section508.gov.

Attachment 2

U.S. DEPARTMENT OF THE INTERIOR SECTION 508-ASSISTIVE TECHNOLOGY CONTACT LIST

Bureau/Office	Contact Name	Email	Phone Number
Department	Sid Sharma	Siddhartha_Sharma@ios.doi.gov	202-219-0963
BIA	David Roberts	No Email	703-735-4172
BLM	Laura Bell	Laura_Bell@blm.gov	202-452-5013
BOR	Casey Snyder	csnyder@do.usbr.gov	303-445-2048
MMS	Robert Garcia	Robert.Garcia@mms.gov	703-787-1067
NBC	Paula Norman	Paula_Norman@nbc.gov	202-208-3412
NPS	Ann Sulkovsky (acting POC)	Ann_Sulkovsky@nps.gov	202-354-2083
OIG	Rhonda Rhodes	Rhonda_Rhodes@doioig.gov	703-487-5388
OSM	Mark Moore Lashonne Williams	mmoore@osmre.gov lwilliams@osmre.gov	202-208-2908 202-208-7940
SOL	Craig Littlejohn	No Email	202-208-6611
FWS	Julie Rundgren	Julie_Rundgren@fws.gov	703-358-1946
USGS	Jillian O'Connell (acting POC)	joconnell@usgs.gov	703-648-4314

Last Updated: 3/14/08

Attachment 3

Bureau DOI LEARN Points of Contact

Bureau	DOI LEARN Point of Contact	Phone	e-mail
FWS	Pat Houghton	304-876-7267	Pat_Houghton@fws.gov
BLM	Catherine Book	602-906-5550	Catherine_Book@blm.gov
USGS	Melanie Hood	303-445-4681	mkhood@usgs.gov
OSM	Judith Blowe	202-208-2552	jblowe@osmre.gov
OS	Barbara Evans	202-208-7274	Barbara_Evans@ios.doi.gov
MMS	Linda Shearer	703-787-1060	Linda.Shearer@mms.gov
BOR	Monica Rodriguez	303-445-2589	mrodriguez@do.usbr.gov
NPS	Rich Arnold	303-969-2726	Richard_Arnold@nps.gov
BIA/BIE	Patti MacLeod	202-208-2893	Patti MacLeod Fax: 202-219-2432
OST	Thomas Bird Bear	505-816-1322	Fax: 505-816-1375
NBC	Robert Veltkamp	202-208-3441	Robert_J_Veltkamp@nbc.gov