Welcome

Meet Mary. Mary works for a Federal agency and is an authorized Government buyer with an official Government purchase card.

Mary’s office has an outdated and inefficient combination copier, printer, and scanner. Mary’s supervisor asked her to purchase a new multifunction machine for the office. The new machine must be able to do the following:

- Print
- Copy
- Scan
- Fax
- Email
- Connect to the network via LAN
- Connect to the wireless network (optional)

Mary’s supervisor, concerned about possible budget cuts, tells Mary that she must find a multifunction machine that meets all of their requirements but does not exceed the micro-purchase threshold. Then, her supervisor reminds her that a multifunction machine is Information and Communication Technology (ICT), so it must be Section 508 conformant.
Purpose and Objectives

The purpose of this course is to explain how Section 508 requirements apply to ICT micro-purchases. To achieve this goal, we will follow Mary through the process of acquiring her multifunction machine.

By the end of this course, you will be able to:

- Define Section 508 and how it applies to your procurement
- Identify a micro-purchase
- Determine the impact of Section 508 standards on micro-purchases
Section 508 of the Rehabilitation Act

For you, and for Mary, to meet the requirements of Section 508, you first need to know what Section 508 is.

In 1998, Congress amended the Rehabilitation Act of 1973 to require Federal agencies to make their ICT accessible to people with disabilities. Inaccessible ICT interferes with a disabled person’s ability to obtain and use information quickly and easily.

Section 508 was enacted to eliminate barriers in information technology, open new opportunities for people with disabilities, and encourage development of technologies that will help achieve these goals.

This standard applies to all Federal agencies and the U.S. Postal Service when they “develop, procure, maintain, or use” ICT. Under Section 508 (29 U.S.C. 794 d), agencies must give disabled employees and members of the public access to information that is comparable to the access available to others.

Section 508 is a required standard and you have a vested interest to comply.
Accessibility for All

Section 508 addresses accessibility for people with the following disabilities:

- Visual
- Hearing
- Mobility
- Cognitive
- Other

Section 508 applies to all ICT products and services that you purchase, including small dollar purchases known as micro-purchases.

It is recommended that you review the standards and regulations listed below to further your understanding about Section 508 and how you can support implementation.

- [Section 508.gov](#)
- [Section 508 Standards](#)
- [Section 508 Federal Acquisition Regulation (FAR)](#)
- [Micropurchase and the FAR](#)
What is a Micro-purchase?

As defined in the FAR Subpart 13.2, a micro-purchase is an acquisition of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold.

The micro-purchase threshold is $3,500 (users of the DFAR have a micro-purchase threshold of $5,000). Always check FAR Subpart 13.2 for the current micro-purchase threshold information and any exceptions that may apply to your procurement.
Micro-purchases and Section 508

It is important that all Government employees responsible for purchasing ICT, such as Requiring Officials, Contracting Officers, Approving Officials, and other Government buyers are aware of their responsibilities regarding Section 508. Since the Governmentwide commercial purchase card is the preferred method to buy goods and services that do not exceed the micro-purchase limit, this includes cardholders using a Government purchase card.

Requiring Officials

Anyone and everyone is or can be a Requiring Official/Government Buyer. As soon as you decide you want to procure something, regardless of your grade level or position description, you become the “Requiring Official.” For example, a secretary ordering a multi purpose machine or a Program Manager ordering a software application is a Requiring Official. As long as you are in the process of buying something or considering a purchase, you are a Requiring Official. Requiring Officials represent the actual customer side – they “own” the need and requirements that will be met by the contract. If you are a Requiring Official you may have several different responsibilities where you need knowledge and understanding of the Section 508 Standards.

Government Buyers

A Government “Buyer” is given written delegation to procure on behalf of the government and are the only individuals authorized to obligate the government for the purchase of goods/services (FAR1.602-2 and FAR1.603-3).

Approving Officials (AO)

In purchase card programs, the AO ensures that the purchase card is used properly. The AO authorizes cardholder purchases and ensures that the statements are reconciled and submitted to the designated billing office in a timely manner. The AO should also review proposed purchases to ensure that purchase cardholders comply with Section 508 requirements.

With her need to purchase a multifunction machine, Mary becomes a Requiring Official. She must follow all the procedures for Section 508 conformant micro-purchases. If Mary is using a Government Purchase card to purchase the multfunction machine, she must also follow the procedures established by OMB Circular A 123 Appendix B, Improving the Management of Government Charge Card Programs.
Knowledge Check

Which of the following statements best defines a micro-purchase?

A. A purchase of supplies or services, the cost of which does not exceed the micro-purchase threshold
B. Any purchase of supplies made with your Government purchase card
C. A purchase of supplies or services using simplified acquisition procedures, the cost of which does not exceed $4,000
Knowledge Check Feedback

The correct answer is A. A micro-purchase is the purchase of supplies or services, the cost of which does not exceed the micro-purchase threshold. The current micro-purchase threshold is $3,500.
Micro-purchase Process Overview

This Module provides an overview of the Micro-purchase process.

To comply with the FAR and Section 508, there are tasks you must perform when making a micro-purchase.

It has been a while since Mary has made a micro-purchase with her charge card. To ensure that she remembers all the rules, Mary finds the ICT checklist she created when she first became responsible for buying small dollar products and services for her office. It is comprised of six steps:

1. Determine if your requirement is ICT.
2. Determine which Section 508 standards apply to your requirement.
3. Perform market research.
4. Complete documentation.
5. Perform any additional agency-specific procedures or requirements (such as receiving AO approval).
6. Purchase your product or service.
What is Considered 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
- Applications
- Websites
- Videos
- Electronic documents

ICT is defined by the [Architectural and Transportation Barriers Compliance Board](https://www.access板.gov) (Access Board).

Mary’s multifunction machine is definitely ICT.
What Section 508 Standards Apply to ICT?

When purchasing ICT, you must determine which Section 508 technical standards apply to the product or service. The Section 508 technical standards are:

- Appendix A to Part 1194 – Section 508 of the Rehabilitation Act: Application and Scoping Requirements
  - 508 Chapter 1: Application and Administration
  - 508 Chapter 2: Scoping Requirements

- Appendix C to Part 1194 – Functional Performance Criteria and Technical Requirements
  - Chapter 3: Functional Performance Criteria
  - Chapter 4: Hardware
  - Chapter 5: Software
  - Chapter 6: Support Documentation and Services
  - Chapter 7: Referenced Standards

The General Services Administration (GSA) has developed automated tools to assist you in researching and developing the Section 508 technical standards that apply to your purchase.

You will learn more about these tools on the following page.
Developing Section 508 Requirements for Procurements

The General Services Administration has numerous free resources located at www.section508.gov that can assist you in developing Section 508 requirements for your procurement of ICT products and services.

- **Accessibility Requirements Tool (ART):** The ART can help you determine if Section 508 applies to your purchase and to find accessibility information when purchasing ICT products and services. The output report from the tool will provide you with the Section 508 requirements.

- **Vendor Accessibility Resource Center:** The Vendor Accessibility Resource Center (VARC) is a comprehensive listing of ICT vendors with URLs to their company accessibility information or Voluntary Product Accessibility Templates (VPATs) to help you with your market research. The VPAT is the format vendors use to describe how their products and services conform to Section 508, and can be used to document a product’s conformance for the purchase file.
Section 508 Exceptions

There are some general exceptions that pertain to Section 508:

- Legacy ICT
- National Security
- Federal Contracts
- ICT Functions Located in Maintenance or Monitoring Spaces
- Undue Burden or Fundamental Alteration
- Alternative Means
- Best Meets

Mary’s multifunction machine does not qualify for any of these exceptions. The equipment she purchases must be Section 508 conformant.
Market Research

Once you know which Section 508 technical standards apply to your micro-purchase, you must perform market research. The goal of your market research is to find a Section 508 conformant product or service for your procurement.

Mary must perform market research to find a vendor that offers a multifunction machine that conforms to all of the applicable Section 508 technical standards for multifunction machines. Mary may use these, and other, resources to perform her market research:

- [www.section508.gov](http://www.section508.gov)
- VARC
- Vendor websites
Micro-purchase Documentation

If purchasing a Section 508 conformant product or service with any of the exceptions in Chapter 2, Scoping Requirements, General Exceptions, you must document in writing.

If you purchase an ICT product or service that is not fully Section 508 conformant, you must provide a justification of your reasons for the purchase (i.e., budget, mission).

In addition, you must complete any documentation required by your agency.

At a minimum, it is recommended that you keep a copy of your documentation AND provide a copy to all others involved in the procurement process, such as the AO and Contracting Officer.
Agency-Specific Policies and Procedures

All agencies are required to adhere to Section 508; however, procedures may differ from one agency to another.

As a cardholder, it is your responsibility to be aware of any agency-specific policies and procedures related to ICT micro-purchases and Section 508. If you are unsure of any agency-specific policies and procedures, check with your agency's Office of the Chief Information Officer (OCIO), Procurement Officer, and Section 508 Program Manager or Section 508 Coordinator.
Complete Your Purchase

The final step in the process is to purchase your product or service.

Mary made her purchase of a fully Section 508 conformant multifunction machine for her office as the standard requires, not realizing that she would see the relevance of the standard requirement in action a short time later.

A few months after the new machine arrived, one of Mary’s coworkers, Stu, was in an automobile accident and broke both of his legs and lost some of his vision. Without realizing it at the time, adhering to the Section 508 requirements ensured that Mary bought a machine Stu was able to use during his recovery from both his wheelchair and computer because of the built in accessibility features.
### Knowledge Check

Determine whether each statement below is True or False.

<table>
<thead>
<tr>
<th>Micro-purchase statement</th>
<th>True</th>
<th>False</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Micro-purchase is the purchase of supplies or services, the cost of which does not exceed the micro-purchase threshold of $3500.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Information and Communication Technology (ICT) you are purchasing does not need to meet Section 508 requirements if your acquisition is using simplified acquisition procedures and is below the micro-purchase threshold.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 508 requirements only apply to ICT being purchased for an office with an employee who is disabled.</td>
<td></td>
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</tr>
<tr>
<td>As a requiring official, or Government buyer, you must determine if your micro-purchase is ICT.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>You have been asked to purchase three new computer monitors to replace aging models used in your office. This purchase is ICT.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Knowledge Check Feedback

Question 1: True. A micro-purchase is defined as the purchase of supplies or services, the cost of which does not exceed the micro-purchase threshold of $3,500.

Question 2: False. ICT purchases using simplified acquisition procedures that are at or below the micro-purchase threshold must meet Section 508 requirements.

Question 3: False. Section 508 requirements apply to ICT purchases regardless of whether a disabled person will be using the ICT being acquired.

Question 4: True. As a requiring official, of Government buyer, it is your responsibility to determine if you micro-purchase is ICT.

Question 5: True. A monitor is computer hardware, and therefore, it is ICT.
Congratulations

Congratulations! You have completed the Micro-purchases and Section 508 Requirements course.

You should now be able to:

• Define Section 508 and how it applies to your procurement
• Identify a micro-purchase
• Determine the impact of Section 508 standards on micro-purchases
Conclusion

You have completed the course material for “Micro-purchases and Section 508 Requirements.”