[Agency Seal or Logo]

Directive No: XXXXXX

Issued by: XXXX

Pursuant to: XXXXX

Issued Date: XX-XX-XXXX

# Managing Accessible Information and Communications Technology (ICT) Template

## Purpose

This directive establishes policy and responsibilities for [Insert Agency Name] implementation of Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. §794d) (hereinafter “Section 508”); Part 1193 and 1194 of Title 36, Code of Federal Regulations (CFR); Subpart 39.2 of the Federal Acquisition Regulation (FAR) and associated regulations; and Section 508 Standards set by the United States Access Board.

Related provisions of the Rehabilitation Act include Section 501 (29 U.S.C. §791), which prohibits employment discrimination against individuals with disabilities in the federal sector, and Section 504 (29 U.S.C. §794), which prohibits federal executive agencies, programs and activities that receive federal financial assistance such as grants from discriminating based on a disability. 

## Scope

Section 508 applies to all Information and Communications Technology (ICT) that federal agencies develop, procure, maintain, or utilize. This includes, but is not limited to, electronic content such as websites, web-based applications, videos, and documents, as well as hardware, software, supporting documentation, and related services. This Section 508 Policy governs all ICT that is developed, procured, funded, maintained, or used by [Insert Agency Name] and its component agencies and offices, including under the following conditions:

* ICT that is used by the Federal government.
* Electronic content that is not public facing but is considered official business and is [agency official communications (E205.3)](https://www.access-board.gov/ict/#E205.3).
* ICT that is newly developed or modified by the agency.
* ICT required for performing essential job duties, such as an application interface that employees within a specific program or job classification must use to carry out their core responsibilities.
* ICT acquired through traditional agency contracting mechanisms, including contracts, interagency agreements, blanket purchase agreements, or shared service agreements.
* ICT acquired through a government purchase card or other micro-purchase methods.

This Section 508 Policy supersedes all prior versions of [Insert Agency Name] Section 508 policies. However, it does not override any other applicable laws or the terms of any existing labor-management agreements in effect as of the effective date of this Policy.

## Authority

* Communications Act of 1934, 47 USC §255 (1996)
* Office of Management and Budget (OMB) Circular A-130, Management of Federal Information Resources (61 FR 6428, February 20, 1996)
* Title 40, U.S.C., 11101 (6), “Clinger-Cohen Act of 1996”
* Public Law 105-220, “Section 508 of the Rehabilitation Act of 1973,” as amended in the Workforce Reinvestment Act of 1998
* Title 36, Code of Federal Regulations (CFR), Part 1194, “Electronic and Information Technology (EIT) Accessibility Standards”
* Title 44, U.S.C., §3501, “E-Government Act of 2002“
* OMB Memorandum, Improving the Accessibility of Government Information (2010)
* OMB Memorandum M-13-13, Open Data Policy-Managing Information as an Asset (2013)
* Federal Information Technology Acquisition Reform Act (FITARA), Public Law 113-291, div. A, tit. VIII, Subtitle D, 128 Stat. 3292, 3438-50 (2014)
* OMB Memorandum M-16-20, Category Management Policy 16-3: Improving the Acquisition and Management of Common Information Technology: Mobile Devices and Services (2016)
* Workforce Innovation and Opportunities Act, Public Law 113-128 (2016)
* OMB Memorandum M-17-06, Policies for Federal Agency Public Websites and Digital Services (2017)
* Web Content Accessibility Guidelines (WCAG) 2.0, incorporated by reference in the Section 508 Standards (2017)
* ICT Accessibility Standards and Guidelines, 36 CFR. §1193 -1194 (2018)
* OMB Circular A-123, Appendix B, A Risk Management Framework for Government Charge Card Programs (2019)
* M-23-22 OMB Memorandum, Delivering a Digital-First Public Experience (2023).
* M-24-08 Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act (2023)
* Title 6, United States Code (U.S.C.), §112 “Secretary; Functions”

## Policy

### General Applicability

1. Section 508 requires [Insert Agency Name] to ensure that any information and communication technology (ICT) it develops, procures, uses, or maintains is accessible to both federal employees and members of the public with disabilities. In accordance with Section 508, these individuals must have access to and be able to use information and data that are comparable to those available to other federal employees and individuals without disabilities. All [Insert Agency Name] [Insert appropriate designation for bureaus/offices/components] are responsible for ensuring that ICT products and services developed, procured, maintained, or used by [Insert Agency Name] comply with the Section 508 Standards.
2. The [Insert Agency Name] Chief Information Officer (CIO) shall oversee the implementation and enforcement of this policy. An Accessibility Governance Board, chaired by the Section 508 Program Manager, shall meet quarterly to review compliance metrics, approve exceptions, and monitor remediation efforts. Internal audits shall be conducted annually, with findings reported to senior leadership. The Section 508 Program shall be integrated with internal controls and performance evaluation processes to ensure ongoing compliance.
3. All [Insert Agency Name] offices and component organizations shall ensure that activities to develop, maintain, procure, or use ICT—whether enterprise-wide or under separate requirements—meet the applicable Section 508 Standards. This responsibility applies to, but is not limited to, systems and applications; external and internal websites; computers and peripheral equipment; information kiosks and transaction machines; telecommunications equipment; customer premises equipment; multifunction office machines; software; videos; and electronic content.
4. All requests for exceptions under E202 of the Section 508 Standards must be submitted in writing to the Section 508 Program Manager and approved by the CIO or their designee. Exception requests must include a documented justification, duration, and mitigation plan. All approved exceptions shall be reviewed annually. [Insert reference to documented Exceptions procedures.]
5. The Section 508 Standards, published by the U.S. Access Board, establish the minimum levels of compliance required. [Insert Agency-specific standards that exceed Section 508 requirements] shall also apply where specified.
6. [Insert Agency Name] shall collect and provide ICT accessibility information and report such data annually in accordance with 29 U.S.C. §794d-1, which mandates reporting on the accessibility of electronic information to individuals with disabilities.

### Acquisition and Procurement

1. ICT that is procured, developed, maintained, and used by [Insert Agency Name] shall conform to the Revised 508 Standards (E201) except where permitted by an applicable general exception (E202) authorized using the [Insert Agency Name] [Section 508 Exceptions process](https://www.section508.gov/ict-accessibility/#e202_2_legacy_ict). General exceptions include:
   1. Legacy ICT
   2. National Security Systems
   3. Federal Contracts
   4. Undue Burden or Fundamental Alteration
   5. Best Meets

Undue Burden or Fundamental Alteration and Best Meets Exceptions shall include exception justification documentation and provide individuals with disabilities access to and use of information and data by an alternative means.

1. For all ICT projects that exceed [Insert X Amount] in lifecycle costs, a Section 508 compliance plan that includes applicable requirements, evaluation criteria and acceptance testing, and quality assurance plans shall be included in the project's standard planning package to be reviewed as part of normal [Insert Agency] procedure per [Insert Applicable Management Directive regarding Investment Review Process (if applicable)].
2. Documentation for the acquisition of [Insert Agency Name] ICT will include relevant Section 508 requirements throughout the procurement process. The [Insert Agency Name] Section 508 Program is responsible for reporting to OMB and other federal agencies on [Insert Agency Name] compliance with the current standards. The Section 508 Program will collect acquisition documentation and data to use for reporting to OMB and on other governmentwide Section 508 initiatives or requirements. Refer to [Insert Agency Name] Section 508 Acquisition Procedure for additional information.
3. The [Insert Agency Name] Section 508 Program in consultation with [Insert Name of Agency's Acquisition Office] will develop and make available training on Section 508 policies and procedures, as related to acquisition processes for use by [Insert Agency Name] acquisition workforce (Contracting Officers, Contracting Officers' Representatives, and Purchase Card Holders).

### Testing and Technology Lifecycle

1. All Section 508 compliance testing for web-based ICT (e.g., web pages and websites) shall be conducted in accordance with [Insert Agency requirements for Section 508 testing competencies and capabilities, including required testing methodologies such as Trusted Tester for Web]. Testing of other ICT shall follow [Insert Agency Name] Section 508 procedures, including requirements for document, software, hardware, and mobile ICT, as well as prescribed methodologies and reporting standards.
2. All [Insert Agency Name] offices shall be prepared to perform Section 508 testing to evaluate and verify the compliance of new or updated ICT, particularly enterprise-wide or mandatory ICT, such as required training modules. Offices shall remediate any identified Section 508 deficiencies or provide equivalent facilitation prior to deployment, or subsequently if inaccessible content is discovered or deficiencies arise.
3. Section 508 subject matter expertise shall be incorporated into Enterprise Architecture Review processes.
4. When [Insert Agency Name] deploys or accepts systems that do not fully conform to applicable Section 508 requirements, an accommodations plan shall be developed to address the needs of employees or members of the public with disabilities. This plan must be authorized and approved by [Insert Agency Office].
5. All offices shall comply with established procedures for handling Section 508-related complaints.

### Enforcement and Non-Compliance

1. Failure to comply with this policy may result in mandatory remediation, formal review by senior leadership, and potential impacts on performance evaluations for responsible individuals.
2. Remediation plans must be implemented within [Insert X Days/Weeks] of a compliance finding unless an approved exception applies.

### Complaints and Accommodation

1. Employees and members of the public may file Section 508-related complaints via [Insert Agency Portal or Contact Method]. All complaints will be acknowledged within [Insert X Days], with investigations initiated within [Insert X Days] and resolution targeted within [Insert X Days].
2. Complaints related to employment will be coordinated with [Insert relevant agency EEO Office equivalent], and public-facing complaints will follow the agency's process established for intake, management, and resolution of complaints related to Section 504 of the Rehabilitation Act.

### Training and Awareness

1. [Insert Appropriate Agency Office] shall maintain current, accurate, and relevant information, resources, training, and methodologies to ensure and sustain conformance with Section 508 Standards.
2. All employees are required to complete annual accessibility awareness training. Specialized training is mandatory for acquisition staff, developers, content creators, and program managers. Completion of training will be monitored, and refresher training will be provided as necessary.

## Stakeholders

The following is a list of stakeholders to be included in this section (see [*Roles and Responsibilities*](https://www.section508.gov/manage/roles/)for additional details):

* Head of agency
* Section 508 Program Managers
* Procurement and Acquisition professionals:
  + Chief Acquisition Officer (CAO)
  + Agency senior procurement executives
  + Purchase card holders
* Human capital executives and professionals
  + Agency Chief Human Capital Officer (CHCO)
  + Agency Equal Employment Opportunity Officer (EEO Officer)
* IT executives and professionals
  + Agency CIO
  + Information Technology Program and Project Managers
  + Product Managers
  + Software Developers and Testers
* Contracting officials
  + Contracting Officers
  + Contracting Officer’s Representative and Requiring Officials

## Definitions

[Insert applicable terms and definitions. See[Section508.gov’s glossary of terms](https://www.section508.gov/content/glossary/) for commonly used terms.]

## Resource

* For general information, contact [Insert Office Name] at [Insert Phone], [Insert Email].
* Captioning Support: The [Insert Office that provides Captioning Support services] provides Closed Caption support. For Closed Captioning Services, contact [Insert Office Contact Name] in [Insert Office Name] at [Insert Phone], [Insert Email].
* For testing: The [Insert Agency Office Name] assists with [Insert Agency Team Services]. Requests for testing assistance should be sent to [Insert Phone Number], [Insert Email]. Requests should be provided within [Insert number of weeks] weeks of the target publication date. The [Insert Agency Office Name] will do its best to provide response within shorter requested timeframes; however, the actual turnaround time will be based on existing workloads and available staffing.
* For training, contact [Insert Agency Training Contact] at [Insert Phone], [Insert Email].

## Signature

[Agency Official Signature]

[Agency Official Name]

[Agency Official Title]

[Agency Official Office]