ACCESSIBLE INFORMATION AND COMMUNICATION TECHNOLOGY (ICT)

1. **REASON FOR ISSUE:** This handbook establishes Department of Veterans Affairs (VA) procedures and guidelines to ensure that VA's Information and Communication Technology (ICT) is accessible to and usable by VA employees and members of the public with disabilities. This handbook was developed to assist VA employees to comply with Section 508 of the Rehabilitation Act and implements policy contained in VA Directive 6221, Accessible Information and Communication Technology (ICT).

2. **SUMMARY OF CONTENTS / MAJOR CHANGES**: This handbook provides general procedures and guidelines to implement policy contained in VA Directive 6221. The handbook also defines VA's responsibilities for the implementation of Section 508 compliance to include incorporating requirements into practice as they relate to development, procurement, maintenance, or use of ICT; managing administrative complaints; and responding to reporting requirements. As Section 508 compliance matures, updates and revisions to this handbook will be issued. The electronic version of the Section 508 standards can be referenced in the resources section of our website at https://www.section508.va.gov/.

3. **RESPONSIBLE OFFICE:** The Office of the Assistant Secretary for Information and Technology (005), Enterprise Program Management Office (EPMO), Enterprise Portfolio Management Division (EPMD), Software Testing and 508, Section 508 Office is responsible for the material contained in this directive.

4. **RELATED DIRECTIVE:** VA Directive 6221, Accessible Information and Communication Technology (ICT).

5. **RESCISSION:** VA Handbook 6221 Accessible Electronic and Information Technology (EIT), dated December 9, 2005.

CERTIFIED BY:

BY THE DIRECTION OF THE
SECRETARY OF VETERANS AFFAIRS:

/s/
Melissa S. Glynn, Ph.D.
Assistant Secretary for
Enterprise Integration

/s/
James P. Gfrerer
Assistant Secretary
for Information and Technology
and Chief Information Officer

Distribution: Electronic Only

ACCESSIBLE ELECTRONIC AND INFORMATION TECHNOLOGY (EIT)

TABLE OF CONTENTS

ACCESSIBLE INFORMATION AND COMMUNICATION TECHNOLOGY (ICT)

Chapter 1. GENERAL INFORMATION AND RESPONSIBILITIES

1. Purpose and Scope

   a. This handbook establishes Department of Veterans Affairs (VA) procedures and guidelines to ensure that VA's Information and Communication Technology (ICT) is accessible to and usable by Veterans, VA employees, and members of the public with disabilities. It provides practical information and establishes general procedures for understanding and applying the Section 508 standards. To assist VA employees in complying with the requirements, this handbook provides guidance for managing administrative complaints and responding to reporting requirements. Implementation of the procedures in this handbook will ensure that all employees with disabilities have access to and use of ICT to perform their assigned functions consistent with the requirements of Section 508.

   b. Chapter 1 offers an overview of Section 508; describes the importance of making ICT products accessible and usable by employees with disabilities, and describes who is responsible for directing the implementation of Section 508 in the Department. Throughout this handbook, the mentioned resources can be located by referring to http://vaww.section508.va.gov/

   c. Section 508 is an integral part of the Department's business processes and supported in numerous ways by the Section 508 Office, including policies, training, interpretation of Section 508 Refresh, auditing, and consultation to projects and personnel across the VA enterprise.

2. Overview

   a. VA considers accessibility to ICT a priority for all employees and external customers. Section 508 was enacted to eliminate barriers in information technology, to make new opportunities available for people with disabilities, and to encourage development of technologies that will help achieve these goals.

   b. The original Section 508 standards served as the guideline for VA's accessibility compliance standards. Consequently, VA along with all other federal government agencies moved to ensure that any ICT developed, procured, maintained, or used on or after June 21, 2001, conformed to Section 508 Standards. The federal government's "Revised 508 Standards," commonly called "Section 508 Refresh" or simply "the Refresh," updated the original standards and took effect March 21, 2017; VA standards align with the 2017 update.

3. Roles and Responsibilities of Key VA Stakeholders in Implementing Section 508

a. VA must incorporate the Section 508 Refresh requirements into practice as they relate to the development, procurement, maintenance, and use of ICT; managing administrative complaints; and responding to internal VA and Department of Justice (DOJ) reporting requirements.

b. Each component within VA is responsible for ensuring ICT they develop, use, maintain, or procure is accessible to all people with disabilities. The definition of ICT is broad in scope; many agency components currently manage their own ICT (e.g., web pages, web applications, software, office equipment), and therefore, responsibility for meeting Section 508 requirements is decentralized. Each Administration or staff office is responsible for insuring ICT meets the applicable Section 508 "Refresh" requirements as required under the law. Section 508 Office's auditing and testing capabilities assist Administrations and Staff Offices in validating ICT being developed, procured, maintained, or used meets relevant standards of law, as updated for the government's "Refresh."

c. Under guidance of the Designated Agency Official, VA will report to DOJ as requested regarding extent to which ICT is accessible to and usable all disabled persons.

d. **The Secretary of Veterans Affairs.** The Secretary has designated the Department's Assistant Secretary for Information and Technology and Chief Information Officer (CIO) as the senior agency official responsible for the Department's ICT programs.

e. **The Assistant Secretary for Information and Technology and Chief Information Officer.** The CIO has overall responsibility for integrated business and ICT planning, evaluation and review of ICT projects, as well as education and awareness of ICT initiatives and legislation related to the implementation of ICT projects.

f. **Under Secretaries, Assistant Secretaries, and Other Key Officials**. These officials will assist the CIO to ensure that all managers are aware of ICT resources regarding the policy and procedures found in VA Directive 6221 and Handbook 6221, Accessible Information and Communication Technology (ICT). These officials shall:

(1) Adhere to established enterprise-wide Section 508 policies and procedures;

(2) Procure ICT that meets VA's Section 508 Refresh accessibility standards for the agency and users;

(3) Ensure that all systems and applications developed, procured, maintained or used by VA have been analyzed, tested and evaluated in coordination with the Department's Section 508 Office for conformance with the legislative requirements of Section 508;

(4) Provide contract language to the Technology Acquisition Center (TAC) for inclusion in contract template for consistency and standardization. The Section 508 office serves in an advisory capacity to contracting activities;

(5) Coordinate 508 initiatives with VA's Section 508 Office;

(6) Submit all requests for legally-defined exceptions to VA's Section 508 Office for review/approval;

(7) Provide consultation in circumstances where the Local Reasonable Accommodations Coordinator (LRAC), the employee, and the employee's supervisor cannot affect provision of a reasonable accommodation and when additional management must be engaged.

g. **Section 508 Office**. The CIO has established a Section 508 Office to implement technical standards, as updated for the Section 508 "Refresh", and as promulgated within the federal government by the U.S. Access Board. These Standards have a compliance date of January 18, 2018. The assigned duties of the Section 508 Office include but are not limited to:

(1) Manage Section 508 Program for VA, to ensure requirements of this directive are complied with and Section 508 Refresh conformance is incorporated into ICT system development and ICT procurements;

(2) Measure and track conformance of ICT to current standards and report findings to upper management and other stakeholders;

(3) Ensure the One-VA Enterprise Architecture Framework encompasses a process for testing and evaluating VA systems and applications to ensure they meet the Access Board's accessibility standards and conform to legislative requirements of the Section 508 Refresh;

(4) Make recommendations, develop policies, and procedures to implement requirements of the Rehabilitation Act, as amended;

(5) Provide recommendations on integration of Section 508 Refresh accessibility requirements into VA's Strategic and Information Technology (IT) Investment Management Plans and acquisition processes;

(6) Provide recommendations, support, and training for Section 508 Refresh requirements;

(7) Review and evaluate ICT requests for deployment recommendations, to ensure conformance with Section 508 Refresh and Office of Management and Budget's (OMB) Exhibit 300 legislative requirements;

(8) Ensure VA Directive 6221, related handbooks and/or associated documents are kept current;

(9) Ensure VA requests for exceptions to Section 508 requirements are evaluated and approved/disapproved;

(10) Ensure Section 508 Awareness Training is provided;

(11) Develop, review, and coordinate accessibility guidance with all VA administrations and staff offices;

(12) Establish Agency-wide processes to ensure, monitoring, and reporting of conformance to laws, regulations, and guidance;

(13) Attend General Services Administration's (GSA) interagency meetings, Section 508 workgroup meetings, and other related conferences and forums on ICT accessibility;

(14) Identify current needs in response to accessibility issues and make recommendations on solutions to ICT deficiencies that impact persons with disabilities;

(15) Provide basic technical support and assistance for employees with disabilities, their managers, and computer support personnel;

(16) Refer any general access concerns (including reasonable accommodation requests) to the Deputy Assistant Secretary for Diversity and Inclusion (ODI);

(17) Ensure participation in various programs and conferences associated with implementation of Section 508 Refresh requirements;

(18) Provide contract language to the Technology Acquisition Center (TAC) for inclusion in contract template for consistency and standardization. The Section 508 office serves in an advisory capacity to contracting activities.

(19) As requested by the Designated Agency Official, complete DOJ survey on how requirements for Section 508 were implemented within the department or agency;

(20) Assist, advise, and consult with all parts of the agency as it achieves and maintains compliance with the law, including but not being limited to such activities as:

(a) System/Product Audits – Intranet and internet ICT audits are conducted continuously across the enterprise. This category includes technologies, environments, and media types; applications that range from small to extremely large; web sites from a few to tens of thousands of pages; various types of content (e.g., Portable Document Formats (PDFs), videos, non-web electronic content, word processing documents, MS PowerPoint, and MS Excel documents); and SharePoint. All are assessed by the Section 508 Office to determine level of conformance and to assist teams or employees/contractors with providing technologies usable by disabled users. Audits can be requested through Section508@va.gov.

(b) eLearning/Mobile – VA provides training electronically through eLearning. Section 508 Office must ensure online courses deployed conform to Section 508 Standards. Courses are submitted to 508 Office where they are scoped, tested, remediated, and certified so that users of assistive technologies (AT) can complete courses in a responsive manner. A combination of both automated and manual auditing is used to compile test results, which are then shared with stakeholders. Section 508 also tests mobile technology. Mobile content includes websites designed for mobile phones and tablets as well as apps developed to be accessed using these devices. Testing consists of a combination of both automated and manual techniques tailored to the environment where content is deployed.

eLearning/Mobile staff conducts audits and provides support to development teams in these two specialized areas of technology, determining compliance of courses and apps, and providing up-to-date guidance as needed to remediate non-conformance. Audits can be requested through Section508@va.gov.

(c) SME Support – Section 508 personnel assist projects, Administrations, offices, and other relevant stakeholders as they create and modify technologies to conform to the law for use by veterans, VA employees, and contractors with disabilities. Provided support is technical and can be short-term or long-term. Section 508 subject matter experts (SMEs) confer with teams and individuals on a technical level, but can also assist VA stakeholders in understanding and executing Section 508 Office administrative procedures. Projects can request a SME be assigned by using the Resource Request Repository (RRR) managed by the EPMD, Software Engineering Office. Information and links to the RRR can be found at the Resource Management Process.

(d) Training – Section 508 Office provides multiple styles of training for managerial, technical, and administrative personnel requiring understanding of Section 508 and associated Refresh, including online self-guided courses, virtual, and instructor-led. In instructor-led courses, attendees may ask questions or consult with trainers who specialize in various technical areas of the Section 508 technical standards. Section 508 Office also conducts "Bring Your Own Document" and "Bring Your Own Mobile" training. Both classes are scheduled as needed by contacting the 508 Office. Additionally, "Ask the 508 Office" meetings are held on the last Tuesday of every month where SMEs are available to answer questions. For further information, consult the Training Options menu link from the Section 508 Intranet for a list of training currently available.

(e) Acquisition – Section 508 advises the Technology Acquisition Center (TAC) and stakeholders in VA enterprise on questions concerning Section 508 impacts in acquisition processes and approvals. Included are the acquisitions of accessibility products, products developed internally, and Commercial-Off-The-Shelf (COTS) technologies purchased for a broad range of information technology needs across the enterprise.

(f) Technical Reference Model (TRM) – Section 508 Office uses TRM to assess products, consult on compliance levels and issues, and interface with vendors, and development teams to improve compliance of vendors' products used in VA. Section 508 Office has an ongoing process to assess numerous products and to support TRM to improve compliance of products used by development teams.

(g) External Relations -- Focuses on the VA Section 508 Office outreach and relationships with outside entities, including other government agencies, National Veteran's Organizations, national organizations supporting efforts to enhance and strengthen accessibility, professional and volunteer accessibility organizations, and vendors who provide commercial products and services which solve accessibility problems.

(h) VA Section 508 Web Site - The Section 508 Web site is a repository of all the activities related to Section 508 within VA. It contains helpful information on the

procurement process, forms used in the Section 508 Office, checklists, policies, procedures, audit tools, training, and Best Practices for Section 508. Additionally, projects can request a SME for development projects, who can provide support for current issues faced by those developing, procuring, maintaining, or using accessible ICT.

h. **Contracting Officers and Contracting Specialists**

(1) Acquisition language is provided for all ICT contracts to enforce the revised Section 508 Standards. This acquisition language will outline requirements which must be met by the Requiring Officials and Project Managers procuring COTS products for VA. The Contracting Officer (CO) is responsible for acquiring ICT that meets applicable Revised 508 standards. COs will review these requirements documents to ensure they contain the applicable language.

(2) The CO is responsible for ensuring that all Requiring Officials who indicate an acquisition should receive an exception to the Revised Section 508 Standards submit appropriate Exception paperwork to the Section 508 Office showing ICT has met the legally-defined exceptions. Where ICT conforming to one or more requirements in the Revised 508 Standards is not commercially available, the agency shall procure ICT best meeting Revised 508 Standards consistent with agency's business needs (See E202.7 "Best Meets" in the Revised 508 Standards). The responsible agency official shall document in writing: (a) The non-availability of conforming ICT, including a description of market research performed and which provisions cannot be met, and (b) the basis for determining that the ICT to be procured best meets the requirements in the Revised 508 Standards consistent with the agency's business needs (See E202.7.1 Required Documentation in the Refresh Standards). Where ICT that fully conforms to the Revised 508 Standards is not commercially available, the agency shall provide individuals with disabilities access to and use of information and data by an alternative means that meets identified needs (See E202.7.2 "Alternative Means" in the Refresh Standards).

i. **Project Managers and Project Officers**

(1) Project managers or project officers must consider accessibility requirements of Section 508 early in project life cycles. Building accessibility requirements into projects from the beginning enables selection of proper development tools and saves time and resources.

(2) The Project Manager (PM) is responsible for including applicable Section 508 language in the Statement of Work (SOW) and purchase requests forwarded to the CO.

(3) The project manager or officer must document how projects are Section 508 conformant if the project is being presented to an appropriate VA Technology Review Board. If a project manager or officer determines that it is not possible to make the project Section 508 conformant due to a significant difficulty or expense, the project manager or officer must present appropriate rationale, and the alternative means a person with a disability would use to gain access to the information. For additional

information, refer to the information given earlier in this Handbook concerning Contracting Officers and Contracting Specialists and the guidance available from the Section 508 Refresh standards, provision E202.7 and sub-provisions.

j. **Web Masters and Developers** - It is the responsibility of all Web masters and application development teams to develop and test their Web pages and applications for Section 508 conformance; this includes an application or web site developer, tester, quality assurance tester, designer, or other responsible person in the development life cycle, to ensure that ICT is conformant with the Section 508 Refresh. Developers and testers should attempt to use the same testing tools used by the Section 508 Office. In addition, all VA components must adhere to enhanced, complimentary Section 508 guidance for websites and digital properties as set forth in VA Handbook 6102, Internet/Intranet Services.

Chapter 2. SECTION 508: THE LAW

1. Summary of the Law

a. This chapter offers both an overview of the standards for compliance and processes for enforcement of Section 508. It gives context to the entirety of the document and provides background and history which may be unknown to many people having responsibilities for Section 508.

b. On August 7, 1998, President Clinton signed into law the Workforce Investment Act of 1998 (Public Law 105-220) which includes the Rehabilitation Act Amendments of 1973 U.S.C.794 (d). Section 508 of the Rehabilitation Act requires that when Federal agencies develop, procure, maintain, or use ICT, employees with disabilities have access to and use of information and data that is comparable to access and use by employees without disabilities, unless an undue burden would be imposed on the agency. Section 508 also requires that individuals with disabilities who are members of the public seeking information or services from a Federal agency, have access to and use of information and data that is comparable to that provided to the public who are not individuals with disabilities, unless an undue burden would be imposed on the agency.

c. This law directed the Architectural and Transportation Barriers Compliance Board (Access Board) to develop and publish ICT Accessibility Standards, which were published in the Federal Register on December 21, 2000. This law also provides for an administrative complaint process to enforce the accessibility standards with respect to ICT products procured by a Federal department or agency on or after the effective date.

d. In July 2010, the United States Access Board began the process of revising or refreshing the Section 508 standards to reflect current, multifunctional technology. The Access Board adopted Web Content Accessibility Guidelines (WCAG) 2.0 Success Criteria and Conformance Requirements by reference as a core set of requirements in the revised Section 508 standards. These standards apply not only to Web content, forms, and applications, but also to non-Web software, hardware and telecommunications equipment user interfaces, electronic documents, and other content. These core requirements are supplemented with other consensus standards and guidelines that address specific ICT areas, including PDF accessibility and several standards applicable to telecommunications equipment.

2. Enforcement and Effective Date

    a. Section 508 established an administrative process under which individuals with disabilities, including employees and members of the public, can file a complaint alleging that a Federal agency has not complied with the Section 508 standards. This process uses the same administrative complaint procedures which cover access to federally funded programs and services. It provides injunctive relief to the prevailing party, but does not provide compensatory or punitive damages. Individuals may also file a civil action against an agency if they so choose. The enforcement provisions of Section 508 originally took effect six months from the date the Access Board published its final standards, or June 21, 2001.

    b. Revisions to the Section 508 standards (the Section 508 Refresh) were finalized and published in the Federal Register on January 18, 2017. The compliance date for the newly published Section 508 standards was January 18, 2018.

    c. There is a provision that some ICT does not have to meet the new standards. The Refresh calls these technologies "legacy," use of the term "legacy" carries a different meaning than does the term "legacy" when used in reference to software projects in the VA. A limited number of ICT technologies fit under this provision. Specifically, any ICT that is currently compliant and has not been altered after January 18, 2018 does not have to meet the Refresh Standards.

    d. Any ICT currently under active development or modified on or after January 18, 2018 must meet the Refresh Standards.

Chapter 3. Purchasing Conformant Information & Communication Technology (ICT)

Ensuring ICT is conformant to Section 508 begins at procurement. Below are steps to ensure procurements are 508 conformant (retain documents created).

Determine requirements. Determine business requirements for products or services to purchase.

1. Determine if the product or service being purchased is ICT.

    a. Ask the following questions:

        (1) Will product or service be used to obtain, store, duplicate, retrieve, or communicate electronic information?

        (2) Does product or service involve hardware or software?

        (3) Does it include multimedia?

        (4) Does it use phone systems or voice communication through Voice over Internet Protocol (VoIP)?

        (5) Will the product or service be available either on Internet or intranet?

        (6) Does it include office equipment used for sharing information, such as printers, copiers, or fax machines?

(7) Will the product or service share electronic information with Veterans, their families, employees, contractors, or other people seeking information from the VA?

(8) If hiring a contractor, will they create and deliver documents or other ICT used to communicate with Veterans, their families, employees, contractors, or other people seeking information from the agency?

b. If the answer to any of these questions is "yes," then the product or service is ICT and Section 508 requirements must be included in procurement process.

(1) ICT Products vs. ICT Services

(a) ICT Products - Items that are tested before the purchase is made, such as a printer, computer, mobile phone, and some software can be tested for Section 508 conformance before it is purchased.

(b) ICT Services - Procurement of ICT services must also conform to Section 508. Section 508 requirements must be specified in contracts prior to procurement of the services. For example, a vendor is hired to build a new software system and develop documentation. Testing software and documentation for Section 508 conformance are included as a requirement in the services contract. Section 508 conformance must be determined before the final deliverable is accepted by VA.

2. Determine whether any Section 508 exceptions apply.

a. There are legally-defined general Exceptions under which ICT does not have to be conformant with the Section 508 refresh:

(1) E202.2 Legacy ICT. Any component or portion of existing ICT that complies with an earlier standard issued pursuant to Section 508 of the Rehabilitation Act of 1973, as amended (as republished in Appendix D), and that has not been altered on or after January 18, 2018, shall not be required to be modified to conform to the Revised 508 Standards.

(2) E202.3 National Security Systems. The Revised 508 Standards do not apply to ICT operated by agencies as part of a national security system, as defined by 40 U.S.C. 11103(a).

(3) E202.4 Federal Contracts. ICT acquired by a contractor incidental to a contract shall not be required to conform to the Revised 508 Standards.

(4) E202.5 ICT Functions Located in Maintenance or Monitoring Spaces. Where status indicators and operable parts for ICT functions are located in spaces that are frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment, such status indicators and operable parts shall not be required to conform to the Revised 508 Standards.

(5) E202.6 Undue Burden or Fundamental Alteration. Where an agency determines in accordance with E202.5 that conformance to requirements in the Revised 508 Standards would impose an undue burden or would result in a fundamental alteration

in the nature of the ICT, conformance shall be required only to the extent that it does not impose an undue burden, or result in a fundamental alteration in the nature of the ICT.

b. Even though a product does not meet a Section 508 requirement, the government must still make its information and services accessible to and usable by people with disabilities. Avoiding commercial non-availability and insisting that all procurements result in ICT that conforms to the 508 standards makes this easier. This is called "Equivalent Facilitation:"

(1) E101.2 Equivalent Facilitation. The use of an alternative design or technology that results in substantially equivalent or greater accessibility and usability by individuals with disabilities than would be provided by conformance to one or more of the requirements in Chapters 4 and 5 of the Revised 508 Standards is permitted.

(2) The functional performance criteria in Chapter 3 shall be used to determine whether substantially equivalent or greater accessibility and usability is provided to individuals with disabilities.

3. Conduct market research to identify vendors whose products meet requirements.

a. Market research identifies vendors that can meet business requirements outlined in (4.a.1). Some sources for conducting market research:

(1) Websites;

(2) Online forums;

(3) Marketing materials;

(4) Referrals/recommendations.

b. It is the responsibility of the individual conducting market research to ensure information obtained is accurate. Vendors can be asked directly about their products compliance to Section 508 standards.

4. Identify vendors whose products meet business requirements and are Section 508 conformant

a. When comparing products identified in market research, focus on products containing features that meet Section 508 requirements. Contact VA Section 508 Office for assistance in identifying applicable Section 508 standards for potential ICT purchase.

(1) Tools Assisting with Market Research. Tools are available to assist research into vendor support of Section 508.

a. Voluntary Product Accessibility Template (VPAT) - A Voluntary Product Accessibility Template (VPAT) is a document completed by vendors detailing level of Section 508 conformance of their product. VPATs are often posted on a vendor's website.

(1) A VPAT can be helpful, but its accuracy must be verified. For example, VPAT may be written by a marketing team in good faith but they may not have the expertise to accurately evaluate the level of accessibility of a product or service.

(2) Make sure VPAT is for the exact product version that supports your requirement.

(3) VPATs include a response option of "does not support." When this option is selected, the vendor should indicate why their product does not support the standard.

(4) VPATs are strictly voluntary and non-binding. VPATs should inform a decision about whether a vendor is credible and has accessibility experience. The content of a VPAT is not a guarantee of Section 508 conformance.

(5) The contents of the VPAT must be read and analyzed to understand what the vendor is saying about the accessibility (or lack thereof) of their ICT.

(6) If you cannot locate a VPAT, contact the vendor and request one.

b. Government Product Accessibility Template (GPAT) -- A GPAT allows the government to identify applicable Section 508 standards and dictate which require a response from a vendor, especially if there are elements of their product that do not meet technical requirements.

c. Request for Information (RFI) -- An RFI is a document issued by the procurement office and sent to vendors asking for information about how they will meet requirements. Contact the procurement office for information about when and how an RFI should be used for VA procurement.

5. Validate market research

a. Once ICT is identified to meet requirements, review and validate market research. Verification of information accuracy is important. Below are useful methods to assist with validation:

(1) Attend product demonstrations - Product demonstrations provide an opportunity to verify compliance. VA standards checklists are a useful source of questions concerning Section 508 compliance of products or services during live demonstrations.

(2) Conduct in-house trials – Verification of a vendors claim that their product is conformant can be conducted prior to purchasing by negotiating a test with the vendor. Section 508 Office may be able to assist with testing. Contact the procurement office for information about when and how in-house trials should be negotiated.

(3) Review VPATS - Review content in vendors' VPATs. Any questions, requests for additional information, or clarifications should be discussed with vendor. This is especially true for responses such as "supports with exceptions" and "does not support."

6. Identify the most Section 508 conformant product or service

   a. Government agencies must purchase the most Section 508 conformant ICT product or service available to meet requirements. It is important to note, any information, documentation, or support that is part of an ICT product or service must be available in a format that can be used by people with disabilities. This includes user manuals, administration and configuration guides, and customer service contact mechanisms including help desk, email, and live chat.

   b. A vendor's product or service deemed fully Section 508 conformant may be purchased. If none meets all applicable Section 508 standards, the individual products must be rated to determine which one is most conformant.

   c. Using Checklists on VA's Section 508 website to identify product/service severity levels of Critical, High, Medium, and Low facilitates decision making process. However, comparison of products in this method should be avoided whenever possible.

   d. Fully conformant ICT should be a priority. Picking fully conformant products avoids extra work once the ICT has been purchased.

7. Submit procurement documentation including Section 508 documentation

   a. Gather documentation for requirements and market research on product or service being procured and submit it for approval. Note: include all documentation related to Section 508 conformance.

   b. Provide VA Section 508 Office with documentation for review. This includes documentation that details your selection process for determining the ICT that is the most Section 508 conformant.

Chapter 4. VA SECTION 508 TRAINING

1. This chapter provides information on where to obtain training on the various aspects of Section 508 implementation with appropriate resource and contact information.

   a. VA Section 508 Office provides training on Section 508 applicability to individual job functions and provides specific guidance on how to address standards. Training formats include web-based training, interactive webinars, and individualized instruction.

   b. A list of current training offered by the VA Section 508 Office is available on the Section 508 Training Options page of the Office's website.