



DFC Office of Information Technology (OIT)
Section 508 Policy

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Document History

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1.0 Purpose

1.1 General

This directive sets forth the U.S. International Development Finance Corporation (DFC) Office of Information Technology (OIT) implementation guidelines for digital accessibility compliance, inclusive of both hardware and software, as is mandated by the Rehabilitation Act (e.g., Sections 501, 503, 505, and 508), the Americans with Disabilities Act as amended, and other international laws that might be applicable to the Agency as a result of the international nature of the Agency’s work and mission (see Section 6 of the Policy for complete authority details).

1.2 Intent and Expectations

This Policy defines the expectations and accountabilities that the Agency shall strive to meet to comply with all applicable rules, mandates, and laws applicable to digital accessibility for all Information and Communication Technology (ICT) and Electronic Information Technology (EIT) to support both members of the public with disabilities and DFC staff with disabilities. For simplicity, this document shall use the term “ICT” to encompass both terms and meanings: “ICT” and “EIT.”

Specifically, DFC, herein referred to as “the Agency,” intends to comply with the **Web Content Accessibility Guidelines 2.1 A and AA**, or latest version thereof as adopted by applicable laws, and the technical provisions found within Section 508 of the Rehabilitation Act to ensure the interoperability of ICT with assistive technology, such as screen-reader programs and screen-magnification programs.

Public-Facing Digital Content and Experiences

DFC provides access to and use of information to members of the public with disabilities who are seeking information or services from DFC. This access must be comparable to that provided to members of the public without disabilities unless doing so creates an undue burden.

That includes—but is not limited to—the following:

- All digital content/experiences published for public use and consumption including:
 - The entirety of content on the DFC website including videos and documents.
 - Videos linked from the DFC website that are hosted on YouTube.
 - Posts to DFC’s social media, including LinkedIn, Instagram, and Facebook.
 - Public communications such as DFC newsletters.

Employee-Facing Digital Content and Experiences

To the extent possible and with the understanding that some employee tools are inherited from other Federal Agencies, such as the Office of Personnel Management (OPM), DFC shall provide accessible ICT to its employees with disabilities. Their access to ICT must be equivalent to the access provided to employees without disabilities unless this requirement imposes an undue burden (defined in [Exclusions and Exceptions](#)).

That includes—but is not limited to—the following:

- All tools/software/systems procured by the Agency for Agency employees or contractors including—but not limited to—the following:
 - Human resource and pay systems
 - Learning management systems
 - Intranet systems
 - Time and attendance systems
 - Email applications
 - Virtual meeting platforms
 - Single sign-on solutions
 - Voicemail and other messaging systems
- All digital content/experiences created for internal use including—but not limited to—the following:
 - Emails
 - PowerPoint slide decks
 - Word documents
 - Excel workbooks
 - PDF documents
 - Videos
 - Presentations/trainings/Learning Management Systems
 - Human resources systems

2.0 Coverage and Exclusions

2.1 Coverage

This Policy covers all ICT that DFC:

- Publishes for public consumption; and
- Creates, or procures, for internal use by DFC employees and/or contractors, inclusive of both hardware and software.

2.2 Exclusions and Exceptions

Section 508 of the Rehabilitation Act allows for certain, limited exceptions by way of [[“Undue Burden,” “Fundamental Alteration,” and “Commercial Non-Availability/Best Meets.”](#)] Please refer to Section 4.0 for the definitions and explanations of those exceptions.

In the event the previously published material is exempted, at minimum, the Agency shall:

- Create a framework to facilitate accessible access to previously published content on an individual, as-needed basis to support individuals with disabilities via a request/ticket system, meaning previously existing digital content will be remediated on an as-needed basis.
- Commit to ensuring that all digital experiences published after the adoption of this Policy shall substantially conform to this policy and to applicable digital-accessibility laws and technical standards, such as WCAG 2.1 A and AA.
- Formally establish a framework for vetting and documenting exceptions inclusive of input from the Agency’s Section 508 Official, OGC, and the Office of Equal Employment Opportunity, Diversity and Inclusion (OEDI).

This Policy does **not** address the accessibility of buildings, physical environments, or other physical devices, such as office microwaves, refrigerators, or coffee makers, and/or other in-office devices that fall outside of the traditional definition of “hardware.”

3.0 Authority

This Policy aims to ensure compliance with the following laws, mandates, and established practices around digital accessibility:

- The Rehabilitation Act of 1973
 - [Sections 501 and 505 of the Rehabilitation Act of 1973](#) prohibit discrimination based on mental and physical disability and require agencies to reasonably accommodate the known physical or mental limitations of qualified employees or applicants with disabilities. The regulations for this law require the federal government to provide equal access to training and promotion opportunities, and reasonable accommodations for workers with disabilities. Section 505 contains provisions governing remedies and attorney's fees under Section 501.
 - [Section 503 of the Rehabilitation Act of 1973](#) requires contractors who have a contract with the federal government for \$10,000 or more, and their

subcontractors who have subcontracts satisfying the same criteria, to take affirmative action to employ and to advance in employment qualified individuals with disabilities.

- [Section 504 of the Rehabilitation Act of 1973](#), codified at 29 U.S.C. § 794, addresses nondiscrimination under Federal grants and programs and defines the term “program or activity” to embrace all DFC operations.
- [Section 508 of the Rehabilitation Act of 1973](#), as amended, codified at 29 U.S.C. § 794d, requires that when Federal agencies develop, procure, maintain, or use electronic and information technology, Federal employees with disabilities have access to and use of information and data that is comparable to the access and use by Federal employees who are not individuals with 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.
- The [Federal Acquisition Regulations 66 FR 20894](#), which is the Federal Procurement rule that further codifies the Federal Government’s commitment to both the Rehabilitation Act and the Americans with Disabilities Act by expressly mandating the procurement of accessible goods and services where possible.
- The [E-Government Act of 2002](#), Pub. Law No. 107-347, 116 Stat. 2899, provides that all actions taken by Federal departments and agencies are to be in compliance with Section 508.
- The [Clinger-Cohen Act of 1996](#), Pub. Law No. 104-106, 110 Stat. 186, addresses information technology reform and the responsibility for acquisition of information technology.
- The [Architectural and Transportation Barriers Compliance Board Electronic and Information Technology Accessibility Standards](#) (also known as the “Section 508 Accessibility Standards”), codified at 36 C.F.R. Part 1194. Those standards outline the express technical requirements that Federal agencies must meet in order to ensure accessible digital experiences for persons with disabilities.
- The [Final Federal Acquisition Regulation \(FAR\) Rule for Implementing Section 508 of the Rehabilitation Act](#), affecting 48 C.F.R. Parts 2, 7, 10, 11, 12, and 39, published at 66 Fed. Reg. 20894 (Apr. 25, 2001), defines the term electronic

information technology (ICT) and incorporates the ICT Standards in acquisition planning, market research, and when describing agency needs.

- The [Federal Acquisition Regulation: Section 508-Based Standards in Information and Communication Technology](#) (Aug. 11, 2021) strengthens FAR requirements for accessibility to electronic and information technology provided by the Federal Government.
- [Section 8 of the Office of Management and Budget \(OMB\) Circular A-130, Management of Federal Information Resources](#), which provides that agencies shall acquire information technology in a manner that considers the need for accommodations of accessibility for individuals with disabilities to the extent that needs for such access exist.
- The [Information Technology Industry Council](#) (ITI) is the leading technology industry voice for accessibility policies and standards. To assist government contracting officials and other buyers in identifying commercially available information and communications technology with accessible features, ITI has developed the Voluntary Product Accessibility Template®, or VPAT®, to create Accessibility Conformance Reports (ACRs). ACRs are reviewed during the acquisitions process to gauge a product's 508 compliance. ACRs are completed and posted to the internet whenever DFC creates a publicly used product, such as the DFC Portfolio mobile application.
- The [Worldwide Web Consortium](#) (W3C) develops standards and guidelines to help everyone build a web based on the principles of accessibility, internationalization, privacy, and security. W3C publishes a variety of standards, guidelines, and technical specifications including Web Content Accessibility Guidelines (WCAG). WCAG 2.0 A and AA guidelines were adopted in the Revised 508 Standards published in 2017.

4.0 Definitions

Unless otherwise specified below, the following terms have the meaning given to them in Section 508 Accessibility Standards, 36 C.F.R. Part 1194.

- A. Agency. Any agency or department of the United States as defined in 44 U.S.C. 3502, and the United States Postal Service.
- B. Alteration. A change to existing ICT that affects interoperability, the user interface, or access to information or data.
- C. Application. Software designed to perform, or to help the user to perform, a specific task or tasks.

- D. Assistive Technology (AT). Any item, piece of equipment, or product system, whether acquired commercially, modified, or customized, that is used to increase, maintain, or improve functional capabilities of individuals with disabilities.
- E. Content. Electronic information and data, as well as the encoding that defines its structure, presentation, and interactions.
- F. Document. Logically distinct assembly of content (such as a file, set of files, or streamed media) that: Functions as a single entity rather than a collection; is not part of software; and does not include its own software to retrieve and present content for users. Examples of documents include, but are not limited to, letters, email messages, spreadsheets, presentations, podcasts, images, and movies.
- G. Hardware. A tangible device, equipment, or physical component of ICT, such as telephones, computers, multifunction copy machines, and keyboards.
- H. Information Technology. Shall have the same meaning as the term “information technology” set forth in 40 U.S.C. 11101(6).
- I. Information and Communication Technology (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; software; applications; websites; videos; and electronic documents.
- J. Public Facing. Content made available by an agency to members of the general public. Examples include, but are not limited to, an agency website, blog post, or social media pages.
- K. Revised 508 Standards. The standards for ICT developed, procured, maintained, or used by agencies subject to Section 508 of the Rehabilitation Act as set forth in 508 Chapters 1 and 2 (36 CFR part 1194, Appendix A), and Chapters 3 through 7 (36 CFR part 1194, Appendix C).
- L. Software. Programs, procedures, rules, and related data and documentation that direct the use and operation of ICT and instruct it to perform a given task or

function. Software includes, but is not limited to, applications, non-Web software, and platform software.

- M. Tools. Software for which the primary function is the development of other software. Software tools usually come in the form of an Integrated Development Environment (IDE) and are a suite of related products and utilities. Examples of IDEs include Microsoft® Visual Studio®, Apple® Xcode®, and Eclipse Foundation Eclipse®.

5.0 Roles and Responsibilities

An extensive list of the roles and responsibilities for the teams and groups that presently exist within DFC are listed in Section 8 of this Policy. In addition, this Policy mandates the creation of four accessibility-focused bodies/roles within DFC.

5.1 Agency Section 508 Officer

The Agency Section 508 Officer shall:

- Be the strategic, dedicated lead and owner of the Accessibility efforts and commitments outlined in this Policy and Program through the formation of a Section 508 Council, complete with representation from IT, HR, OEDI, Office of General Counsel (OGC), and Procurement.
- Actively partner with DFC's Chief Acquisition Officer, Equal Employment Opportunity Officer, Diversity and Inclusion Officer, Chief Human Capital Officer, General Counsel, and other relevant Agency officials, digital services teams, and program staff to ensure implementation of Section 508 and to better support agency-wide accessibility efforts.
- Serve as the Direct Manager of both the Agency Section 508 Program Manager and the Section 508 SME Team and be accountable for ensuring appropriate team staffing and budget.
- Be accountable for the submission of all regulatory reporting on accessibility status and success both internally within DFC and externally to other Federal bodies and regulatory/enforcement bodies.
- Ensure that all DFC policies, as appropriate, account for and include language about accessibility compliance.
- Oversee, develop, and maintain Agency policies, guidebooks, and best practices that support the advancement of accessibility compliance within the Agency.
- Be the voice of the DFC Section 508 Program at public and regulatory events, including membership and participation in relevant authoritative bodies such as the

World Wide Web Consortium (WC3) and the Information Technology Industry Council (ITI).

- Represent the Agency in meetings with the U.S. Department of Justice, the White House, Office of Management and Budget, General Services Administration, and more in matters of accessibility and disability-inclusion.
- With the support of the Section 508 Council (see Section 5.2), create, own, and socialize the three-year roadmap for the Accessibility Program and seek to integrate that roadmap into DFC-wide strategic initiatives.
- In conjunction with Procurement (see Policy Appendix), be a final approver of all Accessibility Exceptions.
- In conjunction with the Office of External Affairs (OEA) and OEDI, lead and track the delivery and fulfillment of accessibility requests for web content published prior to the publication and adoption of this Policy.
- In conjunction with OEDI, establish and co-own an “Escalation” process i.e., (Sections 504 and 508 of the Rehabilitation Act) for accessibility complaints—both those raised by employees and those raised by the public.
- In conjunction with OEDI (see Policy Appendix), ensure that this Policy and the technical standards/laws cited herein remain up to date on an annual basis, at minimum.
- Determine and ensure delivery of the required training needed for each DFC role, including annual general awareness training, and work directly with other leaders across DFC to (a) mandate said training, (b) align on training schedules/frequency, and (c) track completion of said training.
- Keep track of the review cycles and monitor the accessibility landscape for relevant changes in the technical standards and/or regulatory requirements.
- Coordinate DFC involvement with accessibility-related affinity groups and disability nonprofit groups.

5.2 Agency Section 508 Council

This cross-functional body shall include individuals across many DFC offices with the intention of providing a broad range of knowledge and experience to the Agency Section 508 Council. At minimum, the Agency Section 508 Council shall include representation from OIT, OHRM, OEDI, OGC, and Procurement. The Agency Section 508 Council shall:

- Cooperatively author, publish, and maintain DFC’s Section 508 Policy.

- Cooperatively author, publish, and maintain DFC’s public-facing commitment statement for accessibility.
- Provide input into the Five-Year Accessibility Roadmap.
- Work to socialize accessibility across their various realms of influence and to expressly tie other policies to this Accessibility Policy as said other policies are updated.

5.3 Agency Section 508 Program Manager

The Agency Section 508 Program Manager reports directly to the Agency Section 508 Officer (see Section 4.1).

The Agency Section 508 Program Manager shall:

- Be the lead on day-to-day tasks to accomplish milestones and Program goals outlined by the Agency Section 508 Officer and the Section 508 Council.
 - The immediate tasks include:
 - The development of an accessibility resource hub.
 - The creation and socialization of an accessibility education program.
 - The standardization of accessibility testing methods and expectations for each file type.
 - The creation and regular updating of website accessibility statements—both internal-facing and external-facing and inclusive of feedback mechanisms.
 - The statements, at minimum, shall address the following:
the accessibility standard applied to the website and any known limitations or alternative versions, as appropriate; the contact information for the Agency Section 508 Program Manager (name and email address); a public feedback mechanism that allows members of the public to report accessibility problems with Agency websites and digital services to the Agency’s Section 508 program as well as relevant implementation teams; instructions for filing a complaint alleging a violation of Section 508; information about the Agency’s reasonable accommodations procedures for Federal employees and job applicants, consistent with Section 501 of the Rehabilitation Act; instructions on the use of the telecommunications relay service; links to any relevant, publicly available organizational

policies or procedures on digital accessibility; and date that the digital accessibility statement was last updated or reviewed.

- In conjunction with the Agency Section 508 SME Team (see Section 8.2), develop and socialize a formal ticketing system to track accessibility work and requests.
- Lead and deliver on accessibility remediation requests/tickets.
- Prepare level-of-effort estimates as requested.
- Create and maintain a database of Accessibility Conformance Reports for all Agency-used tools and for all published apps and/or the main DFC website.
- Evaluate VPATs and work with tool providers to secure measured improvement in those tools year-over-year.
- Ensure appropriate resourcing and build needed business cases to support team/program expansion under the direction of the Agency Section 508 Officer.
- Establish ongoing partnerships with members of the disability communities: cognitive, blind, etc. both internally (employee resources groups) and externally.
- Represent the Agency in working groups and committees, such as ITI and the W3C.
- Create and lead a DFC Accessibility Champions program, complete with levels and badges and regular updates (see Section 8.9).
- Coordinate and manage a DFC Accessibility Liaisons program with representatives from each business area (see Section 8.10).
- Coordinate web content user testing to include those with disabilities as directed.
- Complete annual training to ensure understanding and possession of the necessary knowledge, skills, experience, and authority to successfully implement Agency-wide digital accessibility policies and to monitor, assess, and provide technical assistance to the Agency regarding Section 508 and ICT accessibility.
- Partner Agency-wide to collect and track accessibility-related metrics—including but not limited to—
 - Number of accessibility complaints and resolutions, both internal and external;
 - Number of 508 Exceptions and their expiration;
 - Number of products outsourced for accessibility services; and/or
 - Section 508 training attendance
- Conduct accessibility reviews and remediations on digital assets as requested.

5.4 Agency Section 508 SME Team

The Agency Section 508 SME Team reports directly to the Agency Section 508 Officer (see Section 4.1).

The Agency Section 508 SME Team shall:

- Be the lead contributors/curators/developers of the DFC Accessibility Hub.
- Be the main contributors/curators/developers of the DFC Accessibility Education/Training Program.
- Serve as partners to file creators and website/content authors as appropriate.
- Serve as partners to Procurement as needed, including reviewing the accessibility documentation collected as part of a solicitation and the conducting of validation testing.
- Support the Office of Human Resource Management (OHRM) and OEDI in the Reasonable Accommodation processes as needed.
- Be the lead authors on any accessibility conformance reports generated for any DFC-owned websites or apps (or the primary initial reviewer if the ACR is authored by a DFC contactor).
- Deliver both informal (e.g., brown bags/lightning talks) and formal training sessions in support of DFC's Accessibility Education plan.
- Publish a quarterly Accessibility Newsletter to celebrate successes, spread knowledge, share what's coming down the pike, and more.
- Create accessible templates for Word documents and PowerPoint slideshows and provide guidance/training on how to use the templates.
- Collectively develop needed dashboards and systems to track accessibility to allow for the regular evaluation, monitoring, and any needed feedback-collection to help measure accessibility efforts and to inform actionable steps to remediate non-conformance in a timely manner.
- Found and maintain the Accessibility Liaisons Program and the Accessibility Champions Program.
- In partnership with other applicable Agency teams/departments, ensure systems are in place to monitor conformance with the Section 508 standards published by the Access Board. These monitoring systems should follow the entire software development lifecycle, including enterprise architecture reviews; IT program reviews; acquisition, design, development, production release reviews; and change control.
- Ensure that, at a minimum, the [ICT Testing Baseline](#) and the [DHS Trusted Tester](#) process are incorporated into all accessibility testing approaches utilized at DFC.

- Conduct accessibility reviews and remediations on digital assets as requested.
- Complete other activities as assigned by either the Agency Section 508 Officer or the DFC Section 508 Council.

6.0 Policy

6.1 Overview

This Policy establishes the Agency's Section 508 Program, assigns roles and responsibilities (see Section 4), and establishes the technical standards for conformance. This Policy ensures conformance with Section 508 of the Rehabilitation Act and aims to ensure that the Agency's digital content, digital experiences, and ICT are inclusive and fully usable by persons with disabilities.

6.2 508 Program Roles and Resources

As indicated in the Roles and Responsibilities section (Section 4), this policy mandates the creation of three new roles within the agency:

- A Section 508 Officer role that owns the enterprise-wide Section 508 compliance effort and serves as the liaison to other Federal agencies on matters of Section 508.
- A Section 508 Program Manager role that manages program success and day-to-day operations.
- A Section 508 SME Team role that provides technical expertise and day-to-day assistance to stakeholders throughout the Agency.

6.3 Key Initial Initiatives/Processes

In addition to the roles above, the creation of the below listed assets and resources is also mandated in order to support the success of this Policy:

- All needed accessibility governance (Owner: Agency Section 508 Council)
- Centralized Accessibility Resource Hub (Owner: Agency Section 508 SME Team)
- Digital Accessibility Testing Framework (Owner: Agency Section 508 Program Manager)
- Accessibility Champions Program (Owner: Agency Section 508 Program Manager)
- Accessibility Liaisons Group (Owner: Agency Section 508 Program Manager)
- Accessibility Education and Communications Program (Owner: Agency Section 508 SME Team)
- Accessibility Exceptions Framework, complete with Tracking (Owner: Agency Section 508 Officer)

- Accessibility Request System for previously published Web content (Owner: Agency Section 508 Officer)
- Customer and Employee Support/Escalation Process (Section 504 of the Rehabilitation Act), complete with Tracking (Owner: OEDI + Agency Section 508 Officer)
- Procurement and Contracting Language, complete with requirements around the submissions of ACRs, Remediation Plans, and Interim-Access Plans as part of all new procurements and renewals (Owner: Agency Section 508 Officer and Procurement)

6.4 Section 508 Program Governance

The program will be governed by:

- The tenets in this Policy
- The Section 508 Council
- The Web Content Accessibility Guidelines 2.1 A and AA

Success and compliance with this Policy shall be determined by:

- The Section 508 dashboards (yet to be created)
- Survey data (yet to be created)
- And the analysis of Section 508 complaints/exception requests.

6.5 Implementation/Operations

To ensure compliance with this Policy, teams across the Agency shall, as applicable,

- Ensure WCAG 2.1 A and AA conformance is included in all project requirements that result in a digital deliverable.
- Ensure WCAG 2.1 A and AA conformance is part of the formal “definition of done” for any digital project.
- Ensure that WCAG 2.1 A and AA conformance reviews are implemented prior to publication of content to the Agency web site.
- Ensure service contracts set appropriate expectation about WCAG 2.1 A and AA conformance.

Additional role-specific expectations are defined in Section 4.

7.0 Policy Maintenance and Internal Controls

The Policy shall be owned, maintained, and socialized by the DFC Section 508 Council. This policy shall, at minimum, be reviewed annually and/or as legal/regulatory updates occur that necessitate changes to this Policy. The Agency Section 508 Officer shall track the review

cycles and monitor the accessibility landscape for relevant changes in the technical standards and/or regulatory requirements.

8.0 Appendix: Additional Roles and Responsibilities

8.1 Agency Chief Acquisitions Officer (CAO), Chief Contracting Officer (CCO), and Agency Procurement and Sourcing Teams

The Agency CAO, CCO, and their Procurements, Acquisitions, and Sourcing teams shall:

- Complete all mandated accessibility training as determined by the Agency Section 508 Officer.
- Ensure the presence of express written requirements that articulate the requirements and expectations around accessibility/Section 508 compliance are included in all applicable contracts, Master Service Agreements, renewals, and more.
 - Includes language around validation testing, and provisions for remediation, should any deliverables have accessibility compliance issues.
- Ensure any provisions/requirements concerning purchase card holders include training and education on all the provisions and expectations within this Section (Section 8.1).
- Integrate representation and input from the Agency Section 508 SME Team in important and/or substantive ICT procurements and sourcing awards to ensure accessibility is considered and accounted for.
- Assign accessibility as a factor in all future procurements, Master Service Agreements, and renewals with support from the Section 508 SME Team.
- With support from the Agency Section 508 SME Team, develop a risk assessment for all ICT procured that do not fully comply with the DFC's accessibility standards and retain those in a centralized repository.
- As part of any applicable ICT bid or procurement, require all respondents to, at minimum, supply the following to the Agency Section 508 SME Team for review:
 - An updated [Accessibility Conformance Report \(ACR\)](#) that is no less than one year old at the time of the procurement and that is based on the 2.5 INT format (or newer).
 - A proposed remediation plan from the vendor/supplier/contractor that details their intended remediation for the accessibility gaps identified in the ACR.

- A proposed interim-access plan, authored by the vendor/supplier/contractor, that will empower persons with disabilities to successfully use the procured solution while formal remediation is underway, with copies provided to the Agency Section 508 Program Manager and to the DFC Reasonable Accommodations Team.

The DFC CAO, CCO, and their Procurements, Acquisitions, and Sourcing Teams shall ensure that tools/software/services procured for use¹ Agency-wide:

- Comply with section 11.002(f) and subpart 39/2 of the Federal Acquisition Regulations (FAR).
- Incorporate and leverage the [Six Steps for Managing ICT Accessibility in Acquisition](#) in acquisition processes, when applicable.
- Incorporate and leverage both the [Accessibility Requirements Tool \(ART\)](#) and [Solicitation Review Tool \(SRT\)](#), as appropriate and applicable, for larger expenditures, or other similar in-house frameworks to ensure accessibility is accounted for in all procurement and solicitation awards.

8.2 Agency CIO and IT Teams

The CIO shall act as the Temporary Section 508 Officer for the Agency until the dedicated Section 508 Officer is hired. The DFC IT teams shall:

- Complete all mandated accessibility training as determined by the Agency Section 508 Officer.
- In conjunction with the Agency Section 508 Program Manager and the Agency Section 508 SME Team, develop, publish, and socialize all needed process documentation to support the integration of WCAG 2.1 and Section 508 compliance into all IT assets and Agency communications, including Standard Operating Procedures (SOPs), brand/style guides, and more.
- Ensure that any ICT developed in-house, or by way of contract or procurement, is designed, coded, and implemented in the most accessible way possible, inclusive of documenting those decisions and paths and summarizing the accessibility by way of [ACR \(version 2.5 INT or newer\)](#).

¹ Some tools might be procured for use by a small, known, contained audience or be an ad hoc purchase. Those type of purchases, with approval from the BU Leader and the Agency Section 508 Officer, can be exempt from the expectations outlined herein.

- Address the needs of current and potential users with disabilities by conducting inclusive research and incorporating applicable Section 508 standards in initial design, prototyping, and pilot efforts.
- With the help of the Agency Section 508 SME Team, conduct accessibility compliance testing and usability testing to ensure inclusive, compliant experiences are built and/or procured that are interoperable with assistive technology, such as screen-reader programs and screen-magnification programs.
- With the help of the Agency Section 508 SME Team, continue to monitor the accessibility of deployed ICT.
- In conjunction with input from the Agency Section 508 SME Team and Web publishing teams, procure and deploy a mass-scanning tool to test for Web accessibility. Provide training on that tool for all web content publishers. Develop scan cadences and remediation expectations/procedures for the results generated.
- As appropriate, incorporate manual accessibility reviews in all new in-house/contractor built web publications/updates through the [Section 508 Support ticket system](#).
- Ensure all IT Product and Program Managers amend their processes and practices to include accessibility as a lifecycle consideration in all digital experiences built or procured by IT for use at DFC.
- Serve as advocates for accessibility compliance across the Agency.

8.3 Office of External Affairs/Communications/Web Publishing Teams

The Agency Customer-Support, Public Relations, Communications, and Web Publishing Teams shall:

- Complete all mandated accessibility training as determined by the Agency Section 508 Officer.
- With the help from the Agency Section 508 SME Team, develop and implement all needed processes, both technical and business, to ensure that all externally published content is accessible, interoperable with assistive technology, and monitored regularly for continued accessibility compliance.
 - Ensure all Communications Managers amend their processes and practices to include accessibility as a lifecycle consideration in all communications built by their teams—including those built by contractors.
 - Incorporate manual Accessibility reviews in all new web publications and substantive updates through the [Section 508 Support ticket system](#) and/or

- any established processes by which Communications contractors vet their work for acceptance by DFC.
- With the help of the Agency Section 508 SME Team, regularly incorporate usability testing inclusive of persons with disabilities where possible on DFC's digital content and experiences.
- Shall follow and support the yet-to-be-established support disability customer support and escalation process.
- Partner with OEDI to help prepare and publish public-facing messages and/or blog posts as appropriate.
 - Global Accessibility Awareness Day (May), National Disability-Employment Awareness Month (NDEAM, October), and International Persons with Disabilities Day (December) are some examples.

8.4 Internal Communications Teams

The DFC Internal Communications Teams shall:

- Complete all mandated accessibility training as determined by the Agency Section 508 Officer.
- With the help from the Agency Section 508 SME Team, develop and implement all needed processes, both technical and business, to ensure that all internally published content is accessible, interoperable with assistive technology, and monitored regularly for continued accessibility compliance.

8.5 Agency Reasonable Accommodations Team

The Agency Reasonable Accommodations Team shall:

- Complete all mandated accessibility training as determined by the Agency Section 508 Officer.
- Provide feedback to the Office of Administration and Agency Section 508 Program Manager on matters related to Section 508 compliance.
- Provide feedback on a periodic basis regarding trends in accessibility issues to improve overall compliance with Section 508.
- Continue to adhere to other reasonable accommodation practices as defined in the [existing Reasonable Accommodations Policy](#) and the [procedures outlined on SharePoint](#).

8.6 Agency Office of Equal Employment Opportunity, Diversity, and Inclusion (OEDI)

The Agency Chief Equal Employment Opportunity, Diversity, and Inclusion Officer (CEDIO) and OEDI Team will:

- Complete all mandated accessibility training as determined by the Agency Section 508 Officer.
- Coordinate efforts to promote diversity, equity, inclusion, and accessibility within the Agency.
- Collaborate with the Agency Section 508 SME Team to provide disability and accessibility awareness observances and activities to the workforce.
- Regularly coordinate with Agency Section 508 Officer to create shared goals and milestones, where appropriate, around Section 508 compliance/disability-inclusion.

8.7 Agency Section 508 Liaisons Program

Managed by the Agency Section 508 Program Manager, the Section 508 Liaisons serve as on-the-ground support for each business area. Each business area leader shall assign, at a minimum, a main liaison and a backup for when the main liaison is unavailable. Liaisons are typically line-level staff.

The Agency Section 508 Liaisons have the following responsibilities:

- Provide consultation and assistance to employees in the business area to verify that ICT is accessible.
- Act as liaison between their business area and the DFC 508 Office for training and consultation requests.
- Work with the DFC 508 Office to test and remediate ICT when necessary.
- Complete a basic level of training based upon the content that the business area creates.
- Attend quarterly meetings to discuss accessibility issues and expand accessibility skills.