

GENERAL SERVICES ADMINISTRATION
Washington, DC 20405

CIO 2105.1D
January 7, 2019

GSA ORDER

SUBJECT: GSA Section 508: Managing Information and Communications Technology (ICT) for Individuals with Disabilities

1. Purpose. The purpose of this Order is to implement [Section 508 of the Rehabilitation Act of 1973](#), as amended, throughout the General Services Administration (GSA).

2. Cancellation.

a. This Order supersedes and cancels CIO 2105.1C CHGE 1 GSA Section 508: Managing Information and Communications Technology (ICT) for Individuals with Disabilities, dated August 20, 2015.

b. This Order supersedes and cancels CIO 2105.2 P GSA Section 508 Procedures Handbook, dated December 16, 2009. More information about GSA's Section 500 procedures may be found at [IT Accessibility & Section 508](#) (available only to those on GSA's network)..

3. Applicability.

a. The provisions of this Order are applicable to all GSA employees involved in the design, development, procurement, or use of Information and Communication Technology (ICT), to include 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.

b. This Order applies to all GSA Services, Staff Offices, and Regional Offices (S/SO/R), regardless of whether it currently employs individuals with disabilities.

c. This Order applies to the Office of Inspector General (OIG) to the extent that the OIG determines this Order is consistent with the OIG's independent authority under the IG Act and it does not conflict with other OIG policies or the OIG mission.

d. This Order applies to the Civilian Board of Contract Appeals (CBCA) to the extent that the CBCA determines it is consistent with the CBCA's independent authority under the

Contract Disputes Act and other authorities and it does not conflict with the CBCA's policies or the CBCA mission.

4. Policy.

a. As mandated by [Section 508 of the Rehabilitation Act of 1973](#) and the [U.S. Access Board's ICT Final Standards and Guidelines](#), GSA will make ICT accessible to all individuals with disabilities and accommodate the needs of employees and program participants.

b. GSA will identify the needs of users with disabilities when it procures, develops, maintains, or uses ICT. This will include a determination of how individuals with disabilities will perform the functions supported by the ICT and how the ICT will be developed, installed, configured, and maintained to support individuals with disabilities.

c. Failure to meet Section 508 obligations could result in unlawful discrimination against individuals with disabilities.

5. Nature of Revision. This revision incorporates the U.S. Access Board's [Revised 508 Standards](#) that went into effect in March 2017 and were amended on March 23, 2018.

6. Responsibilities.

a. Heads of Services and Staff Offices (HSSO). HSSOs will:

(1) Support efforts of management and technical personnel to ensure that all ICT developed, procured, maintained, or used by GSA is accessible to individuals with disabilities. This includes access to and use of Federal public information resources and/or work-related ICT resources;

(2) Appoint a Section 508 point of contact (POC) for the S/SO/R to respond to employee inquiries on Section 508 and accessibility. The [list of contacts](#) is posted on InSite;

(3) Respond to the Section 508 Program Office's annual data call to confirm the availability or update of the S/SO/R Section 508 POC; and

(4) Ensure management personnel under their direction:

(a) Require that public facing ICT conforms to the applicable Section 508 standards and is accessible to persons using assistive technology;

(b) Require that all electronic content used for external and internal official agency communications (see the definition of [Agency Official Communications](#), below, for details), including such content posted to the agency intranet, conforms to the applicable Section 508 standards.

(c) Inform employees of the [Section 508 POC](#) for the S/SO/R;

(d) Require that ICT resources be readily configured to accommodate the needs of individuals with disabilities. Exceptions may be granted by the CIO for certain types of specialized software, which, due to its inherent visual and audio features, may be unable to fully comply with Section 508. See [Section 508 Guidance](#) on determining exceptions;

(e) Require that S/SO/R POCs and employees involved in the design, development, procurement or use of ICT take at least two hours of Section 508 accessibility and/or technical training every two years;

(f) Require that accessibility be planned for and monitored throughout the ICT acquisition and systems development life cycles. The HSSO must require that all government specific products meet Section 508 accessibility guidelines. [GSA guidance](#) requires GSA organizations to:

1. Determine accessibility (technical) requirements;
2. Conduct market research;
3. Develop contractual terms and conditions (solicitation language);
4. Evaluate proposals; and
5. Validate contractor compliance through the end of the contract.

(g) Enforce captioning of all audio and video multimedia developed or procured and posted on a GSA website unless there is a clear and compelling reason not to, such as when waiting for closed captioning would harm GSA's ability to communicate immediately on an important issue; if such is the case, a note must be added to the video description explaining why the material was posted without captions and when closed captions would be available; and

(h) Test and remediate all websites, web applications and mobile apps to meet the [technical requirements of Section 508](#) (see [GSA Section 508 Procedures Handbook](#), Chapter 2, for specific requirements).

b. GSA Requiring Officials. Requiring officials will:

(1) Develop Section 508 technical requirements and ensure they are included in the solicitation requirements document. The [Accessibility Requirements Tool](#) (ART) is recommended for use to develop the requirements.

(2) Conduct market research to determine if solutions exist that include the accessibility features and functionality needed, as defined in the accessibility requirements.

(3) Request [Accessibility Conformance Reports](#) (ACRs) from Vendors and Contractors, using the current version of the [Voluntary Product Accessibility Template](#)™

(VPAT) when procuring commercially developed products (e.g., Commercial or Government off-the-shelf products)

(4) Evaluate ICT solicitations against Section 508 technical requirements and factor accessibility into Technical Evaluation Panels (TEP) and award decisions.

(5) Specify contractual terms and conditions for assessing and evaluating vendor accessibility claims, and to ensure accessibility throughout the product life cycle.

(6) Validate contractor compliance to ensure that ICT remains accessible throughout the contract period of performance.

c. Contracting Personnel. Contracting Officers, Contracting Officer Representatives, Contracting Specialists, and others involved in the acquisition of ICT will:

(1) Review and comply with the acquisition regulations for implementing Section 508, found at FAR 7.103, 10.001, 11.002(f) and subpart 39.2, as well as ensuring compliance with this policy;

(2) Be familiar with the [Acquisition Portal Section 508 topic webpage](#), which contains additional guidance and resources for complying with FAR 7.103, 10.001, 11.002(f) and subpart 39.2; and

(3) Complete at least 2 hours of Section 508 awareness and/or technical training every 2 years.

d. The Chief Information Officer (CIO) and the Office of GSA IT. The CIO is the senior agency official responsible for establishing guidance on ICT accessibility management, to include ensuring access to Federal public facing information resources for persons with disabilities. The CIO will ensure that the needs of users with disabilities are identified when GSA procures, develops, maintains, or uses ICT. This responsibility includes a determination of how users with disabilities will perform the functions supported by the ICT and how the ICT will be developed, installed, configured, and maintained to support users with disabilities. The CIO will:

(1) Establish the GSA Section 508 Program, and implement Section 508 policy management and procedures;

(2) Raise levels of agency awareness and manage the Section 508 program;

(3) Create and provide guidance, training, references and other information for agency employees to learn, understand and implement Section 508 in everyday program activities;

(4) Ensure that the GSA IT Section 508 Program Office has the responsibility for examining and assessing the accessibility of proposed software to be included in the IT Standards Profile;

(5) Oversee and ensure that all GSA organizations' ICT (electronic content, software, hardware, and support documentation and services not qualifying for an exception) meet and maintain accessibility requirements;

(6) Ensure accessibility requirements are specified in solicitations for ICT, and that accessibility is a factor in award decisions. GSA solicitations should request Accessibility Conformance Reports (ACR) based on the current version of the Voluntary Product Accessibility Template™ (VPAT). This may include conducting a data call on organizations' solicitations to identify where improvements are needed. GSA software and website design and development practices must include accessibility throughout the lifecycle, unless an exception is approved by the CIO (see Section 7 below);

(7) Work with the S/SO/R to determine the percentage of conformance to the Section 508 technical requirements for intranet and internet information systems;

(8) Monitor and report inaccessible ICT, including online media and multimedia;

(9) Refer all Section 508 complaints of discrimination to the Office of Civil Rights (OCR); and

7. General Exception. There are some situations where ICT may be exempt from complying with Section 508 requirements. The [U.S. Access Board's Revised Section 508 Standards](#) identifies specific possible exceptions, details of which are made available in the [GSA Section 508 Procedures Handbook](#). An exception will not alleviate the need to provide an alternate accessible format when requested. ICT that existed prior to January 18, 2018 (referred to as legacy ICT) that conformed to the Original 508 Standards is not required to be modified to comply with the Revised 508 Standards. This provision only applies to the component(s) or function(s) of the ICT previously determined to be compliant, and only to the extent that such components of the ICT are not altered. To request an exception, the Requiring Official shall follow the procedures outlined in the [GSA Section 508 Procedures Handbook](#), Chapter 1. If an exception is granted, the Requiring Official will provide access to the information and data by alternative means. The Requiring Official will identify in advance the needs of people with disabilities affected by each exception and implement a plan to meet these needs through alternative means.

8. Section 508 Discrimination Complaints. OCR investigates and processes complaints alleging discrimination concerning Section 508. GSA OCR can be reached at 1800 F Street, NW, Room 2331, Washington, D.C. 20405, or call 202-501-0767 or 1-800-877-8339 (TDD), or through eeo@gsa.gov.

9. Accessibility Statement on GSA Websites. GSA intranet and internet websites will include a link to an accessibility statement that presents GSA's commitment to Section 508 and accessibility and note when the statement was last updated. Additional guidance on the language for an accessibility statement is found in the [GSA Section 508 Procedures Handbook](#).

10. Definitions.

a. Accessibility Management. The practice of ensuring equal access to and use of all ICT resources by individuals with and without disabilities. Accessibility management must be addressed during the planning and acquisition of all ICT resources to ensure all ICT resources utilized can accommodate individuals with disabilities.

b. Agency Official Communications. Electronic content that is not public facing shall conform to the applicable accessibility requirements when such content constitutes official business and is communicated by an agency through one or more of the following:

- (1) An emergency notification;
- (2) An initial or final decision adjudicating an administrative claim or proceeding;
- (3) An internal or external program or policy announcement;
- (4) A notice of benefits, program eligibility, employment opportunity, or personnel action;
- (5) A formal acknowledgement of receipt;
- (6) A survey questionnaire;
- (7) A template or form;
- (8) Educational or training materials; or
- (9) Intranet content designed as a Web page.

c. Assistive Technology. Any item, piece of equipment, or system, whether acquired commercially, modified, or customized, that is commonly used to increase, maintain, or improve the functional capability of individuals with disabilities.

d. Electronic Content. Information and data, as well as the encoding that defines its structure, presentation, and interaction. Two types of electronic content must meet the Section 508 standards, public facing, and certain types of agency official communications.

e. Information and Communications Technology (ICT). Any information technology, equipment, or interconnected system or subsystem of equipment for which the principal function is the creation, conversion, duplication, automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, reception, or broadcast of data or information. Examples of ICT are:

- (1) Electronic content;
- (2) Telecommunications products;

- (3) Computers and ancillary equipment;
- (4) Software;
- (5) Information kiosks and transaction machines;
- (6) Information technology services;
- (7) Multifunction office machines which copy, scan, and fax documents.
- (8) Web based intranet or Internet information and applications;
- (9) Multimedia (including video and pictures); and
- (10) Other related resources defined by the Administrator.

f. Information Technology. As defined in the FAR subpart 2.1, any equipment or interconnected system(s) or subsystem(s) of equipment that is used in the automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by the agency.

(1) The term "information technology" includes computers, ancillary equipment (including imaging peripherals, input, output, and storage devices necessary for security and surveillance), peripheral equipment designed to be controlled by the central processing unit of a computer, software, firmware and similar procedures, services (including support services), and related resources.

(2) The term "information technology" does not include any equipment that:

- (a) Is acquired by a contractor incidental to a contract; or
- (b) Contains embedded information technology that is used as an integral part of the product, but the principal function of which is not the acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information.

g. 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.

h. Requiring Officials. The program manager or other government staff delegated with responsibility for developing ICT requirements.

i. Undue Burden or Unduly Burden(ed). To cause a significant difficulty or expense. When there is an undue burden, an alternative means of access must be provided to individuals with disabilities. Determinations of undue burden and alternative means of

access must be made consistent with the standards established in the Revised 508 Standards.

j. Voluntary Product Accessibility Template™ (VPAT). The vendor's self-representation of their product(s) or service(s) conformance to the Section 508 technical standards.

11. Signature.

/S/

DAVID SHIVE
Chief Information Officer
Office of GSA IT