



# United States Department of the Interior

OFFICE OF THE SECRETARY  
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## Department of the Interior Guidance Release 2008-03

**Subject:** Ensuring Applicable Section 508 Standards when Acquiring Electronic and Information Technologies (E&IT)

**References:** OMB Memorandum dated November 6, 2007, Ensuring the Accessibility of Federal Electronic and Information Technologies Procured by Federal Agencies; and Section 508, Rehabilitation Act of 1973(29 U.S.C. 794d) and FAR Subpart 39.2-Electronic and Information Technology

**Issue Date:** March 31, 2008

- 1. Purpose:** This acquisition guidance release is issued to remind procurement and information technology staff of mandated OMB policy to ensure the acquisition of accessible electronic and information technology unless an exception applies and is documented.
- 2. Effective Date:** Effective immediately.
- 3. Background and Explanation:** Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d) requires federal agencies to purchase electronic and information technology that meet specific accessibility standards. The purpose of this law is to help ensure; (1) that Federal employees with disabilities have access to and use of the information and data they need to do their jobs, which reduces barriers to job success and mobility; and, (2) that members of the public with disabilities have the ability to access government information and services.  
OMB's November 6, 2007 memorandum serves as a reminder to both the information technology and acquisition workforce personnel of their collaborative roles in this area and suggests activities and tools to help agencies fulfill their responsibilities in implementing the law.
- 4. Applicability:** Consideration of the Section 508 standards must be part of the procurement planning process, market research and requirements definition. The standards must be included in all applicable solicitations.
- 5. Section 508 Compliance:** Bureau Procurement Chiefs (BPCs) and Bureau Chief Information Officers (BCIOs) should review their procurement and information technology acquisition policies and procedures to validate that Section 508 standards are appropriately considered and clearly stated in solicitation documents. Additionally,

BPCs should periodically review a sampling of bureau procurements that include E&IT to ensure that solicitations properly specify the appropriate Section 508 standards. For procurements that do not meet the standards, an amendment will be required.

Under Section 9(b)(xiii) of OMB Circular A-130, "Management of Federal Information Resources", BCIOs are responsible for monitoring agency implementation of Section 508 and are required to ensure selected systems or processes facilitate accessibility. Additionally, Section 53 and 300 of OMB Circular A-11, "Preparation, Submission, and Execution of the Budget", instruct agencies to ensure IT Capital Planning and Control comply with Section 508 requirements. All project managers must review capital planning and investment control documentation for compliance with Section 508.

Attached for your use and consideration is the assessment criteria used by the General Services Administration for evaluating Section 508 compliance. Additionally, the Buy Accessible Wizard [[www.buyaccessible.gov](http://www.buyaccessible.gov)] is an available resource that can be used to guide officials through the necessary steps in conducting acquisitions that comply with Section 508. Free on-line training on Section 508 compliance is also available at [www.Section508.gov](http://www.Section508.gov).

6. **Additional Information:** If you have questions about this matter, please contact LaTonya Garrett, Office of Acquisition and Property Management, at (202) 513-0747.



Debra E. Sonderman, Director  
Office of Acquisition and Property Management and  
Senior Procurement Executive

Attachment

### **Section 508 Compliance Evaluation of Solicitations – Suggested Assessment Criteria**

All solicitations are first assessed to determine if they include electronic and information technologies (E&IT). For those solicitations that do include E&IT-related deliverables (products, labor hours, or information content), all available documents are reviewed to see if Section 508 requirements or other accessibility factors are addressed in these documents. The solicitation is then scored as follows:

1. If no mention of Section 508 is found, the solicitation is scored as **red\***.
2. Solicitations that mention Section 508 requirements apply generally to product, labor hour or information content deliverables are scored as **yellow**.
3. When broad sections and/or specific provisions of the Access Board Standards are included, the solicitation is scored as green. Solicitations that claim a Section 508 exception are also scored as **green** if the documentation provides a coherent rationale for the exception.

\*Note – Any applicable exceptions are not assumed. While these are rare, the possibility exists that some solicitations marked red have valid exceptions. Solicitations that included documented exceptions were scored green.

Although not specifically required, including any applicable exceptions in solicitations is a best practice that shows that the 508 Standards were considered by the requiring official. Resources: the Buy Accessible Wizard at [www.buyaccessible.gov](http://www.buyaccessible.gov) and the Buy Accessible Glossary found at that site can be used as references when preparing and reviewing solicitations. General Section 508 information is always available at [www.Section508.gov](http://www.Section508.gov). The Access Board technical standards can be found: <http://www.access-board.gov/sec508/standards.htm> For technical assistance regarding Section 508, contact Sid Sharma at 202-219-0963