

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



Preventing Conflicts of Interest
in the Executive Branch

Section 508 Policy

FINAL

Information Technology Division

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Table of Contents

Background	3
Delegations and Authorities	3
Scope.....	3
Applicability.....	4
Policy Objectives	4
1. Accessibility Standards:	4
2. Procurement:	4
3. Website Accessibility:.....	4
4. Software and Applications:	4
5. Document Accessibility:	5
6. Training and Awareness:	5
7. Monitoring and Compliance:.....	5
8. Feedback Mechanism:	5
9. Continuous Improvement:	5
10. Roles and Responsibilities:	5
11. Policy Integration:	5
Section 508 Program and Policy Objectives	6
Automated Tools	7
Implementation and Review	7
Signatures	8

Background

Section 508 of the Rehabilitation Act of 1973 (updated March 31, 2017), requires that when Federal government agencies develop, procure, use, or maintain information and communication technology (ICT), it must be accessible to persons with disabilities (that is, it must provide substantially equivalent access to that provided to persons without disabilities). The standards apply to ICT that can be accessed by the public and employees with disabilities.

Section 508 covers technology procured by a Federal agency under contract with a private entity or produced within the agency itself. It applies to all ICT, including software, web sites, web applications, and hardware applications such as computers, peripherals, and other types of electronic office equipment.

Delegations and Authorities

OGE senior management has delegated responsibility for Section 508 matters as follows:

1. As Section 508 Program Manager, the Chief Information Officer (CIO) is responsible for planning, operation, and management of OGE's software, hardware, and system matters needed to enable the agency to meet its Section 508 obligations.
2. The CIO will designate a Section 508 Coordinator to manage the day-to-day responsibilities of the Section 508 Program. The Program Coordinator oversees compliance efforts and handles accessibility inquiries. The Program Coordinator will collaborate with the Program Manager to develop and provide Section 508 awareness training to a general audience as well as to those with specific roles in implementing the Section 508 Program.

Scope

This Section 508 Policy applies to ICT that OPM develops, procures, maintains, and uses, such as electronic content, hardware, software, and supporting documentation and services.

Applicability

The United States Office of Government Ethics (OGE) is committed to ensuring accessibility and usability of all digital content and technology for individuals with disabilities in accordance with Section 508 of the Rehabilitation Act (29 U.S.C. § 794d) and the accessibility standards outlined by the General Services Administration (GSA). This policy applies to all OGE employees, contractors, and partners involved in the creation, procurement, maintenance, or use of Information and Communication Technology (ICT).

This Policy applies to all ICT developed, procured, funded, maintained, or used by OGE. This Section 508 Policy applies to all OGE internal, electronic content and communications and external, electronic content that is shared with other agencies or available publicly as well as OGE software, hardware, and other electronic equipment.

This Policy does not apply to an OGE contractor's own internal workplace ICT but does apply to any final ICT product identified within the procurement request package.

Section 508 Policy Objectives

1. Accessibility Standards:

To the fullest extent possible, OGE will follow GSA's accessibility standards to ensure our websites, software, and electronic documents are usable by individuals with disabilities. This means our digital platforms comply with guidelines like WCAG 2.1 Level AA.

2. Procurement:

When acquiring technology, we require vendors to meet Section 508 standards. Contracts specify accessibility criteria and responsibilities for compliance.

3. Website Accessibility:

Our websites are designed to be accessible. We provide text alternatives, keyboard navigation, readable color contrast, and compatibility with assistive technologies like screen readers.

4. Software and Applications:

All software we use or develop is made to be accessible. This includes ensuring it works with screen readers, can be operated by keyboard alone, and has clear interfaces.

5. Document Accessibility:

Documents we create are accessible, with features like text recognition, proper headings, image descriptions, and accessible tables. We can provide documents in alternative formats upon request.

6. Training and Awareness:

We provide training on accessibility to staff and contractors. This covers accessible design principles, testing methods, and assistive technology use.

7. Monitoring and Compliance:

We regularly check our digital content for accessibility and address any issues found. We conduct assessments and audits to ensure compliance.

8. Feedback Mechanism:

We welcome feedback on accessibility issues encountered while using our digital platforms. Feedback should be addressed to section508@oge.gov. Reports are promptly addressed to enhance accessibility.

9. Continuous Improvement:

We strive for continuous improvement by staying updated on accessibility standards, implementing feedback-driven improvements, and fostering an accessibility-focused culture.

10. Roles and Responsibilities:

The Policy describes the roles and responsibilities of employees and others who support OGE's 508 compliance activities and will be reviewed annually.

11. Policy Integration:

OGE will incorporate information and communication technology (ICT) into relevant agency policies and directives, that govern procurement, development, maintenance, and use of ICT including OGE's Diversity, Equity, Inclusion, and Accessibility (DEIA) Strategic Plan.

Section 508 Program Objectives

The Section 508 Policy will support Section 508 Program objectives.

Section 508 requires conformance to Web Content Accessibility Guidelines (WCAG) 2.0 Level A and AA. This is the standard by which most legal requirements are judged. OGE will aspire to meet or exceed these requirements. This Policy requires mandatory Section 508 awareness training for the following groups:

- a. General awareness for all employees
- b. Role-based awareness for the following:
 - Contracting Officer's Representative (COR)
 - Purchase Card Holders
 - Developers
 - Web Content Managers

The Section 508 Policy will seek to accomplish the following:

- Assist acquisition personnel to assess Section 508 requirements in the acquisition process;
- Assist developers in designing accessible ICT;
- Evaluate web content, software, and/or hardware for Section 508 conformance;
- Provide accessibility training to the groups identified above;
- Provide alternative formats for Section 508-compliant documents; and
- Assist in the creation or review of documents for Section 508 conformance.

The Policy will seek to address OGE's primary challenges in implementing and complying with Section 508, including:

- a. Lack of human capital and budgetary resources
- b. Raising general awareness
- c. Addressing training needs for 508 compliance
- d. Increasing knowledge of web content managers
- e. Increasing knowledge of developers

The Policy identifies the roles and responsibilities of employees and others who support OGE's 508 compliance activities, and will be updated regularly.

The Policy requires the incorporation of information and communication technology (ICT) into relevant agency policies and directives, including policies and directives that govern procurement, development, maintenance, and use of ICT.

Automated Tools

In addition to the tools built into Adobe (PDF) and Microsoft Office software such as Outlook, Word, PowerPoint, OGE will investigate the feasibility of acquiring and using automated accessibility testing tools for large-scale monitoring of web content to complement our current use of Monsido. Personnel who use these tools will receive training on using the tool and interpreting the results.

Implementation and Review

This policy is effective immediately and will be reviewed annually to keep pace with evolving accessibility standards. Non-compliance may result in corrective actions, such as training or adjustments, to meet accessibility requirements.

OGE is dedicated to ensuring equal access to information and technology for everyone, in line with federal accessibility guidelines. For questions about our Section 508 Policy, please contact our Accessibility Coordinator Mohamed Zaky at section508@oge.gov.

Signatures

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