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FEDERAL AVIATION ADMINISTRATION

SECTION 508 COMPLIANCE PLAN

Fiscal Year 2003

Version 1.0



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Information Management Division
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EXECUTIVE SUMMARY

This document is the Federal Aviation Administration (FAA) fiscal year (FY) 2003 plan for attaining compliance with Section 508 of the Rehabilitation Act of 1973 as amended in 1998.

The purpose of this document is to inform managers and employees within the lines of business (LOBs), staff offices (SOs), regions, and centers of the Section 508 standards and requirements necessary to implement, comply, and institutionalize Section 508 of the Rehabilitation Act of 1973 within the FAA.

On June 14, 2001, Secretary Mineta issued an access to electronic information technology (EIT) policy statement. The policy requires the Department of Transportation (DOT) to provide access to all of its programs, services, and information to people with disabilities that is comparable to the level of access provided to others. This policy establishes the mandate that the DOT meets the standards and acquisition requirements of Section 508 of the Rehabilitation Act of 1973. Section 508 requires that when Federal agencies develop, procure, maintain, or use EIT, they shall ensure that EIT allows Federal employees with disabilities to have access to and use of information comparable to the access and use of information and data by Federal employees who are not individuals with disabilities — unless an undue burden would be imposed on the agency. Complaints and lawsuits can be filed against products that are not in compliance with the Section 508 standards. Federal agencies are not required to “retrofit” existing technologies. The Section 508 standards are technical specifications and performance-based requirements that focus on the functional capabilities covered by technologies. The standards are organized into six sections:

- Software Applications and Operating Systems
- Web-based Intranet and Internet Information and Applications
- Telecommunications Products
- Video and Multimedia Products
- Self-Contained Closed Products (e.g., facsimiles and copiers)
- Desktop and Portable Computers

Section 508 coordinators have been designated in each of the LOBs, SOs, regions, and centers. These Section 508 coordinators will meet periodically as the Section 508 working group to plan and guide the compliance program.

Successful implementation of Section 508 will:

- Provide access to information, programs, and services provided by the Federal Government to 54 million Americans with disabilities.
- Improve accessibility and opportunity for all Americans with disabilities.

This document provides the plan that the FAA will use as guidance to implement and develop compliance activities within the agency during FY-03.

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FAA Section 508 Compliance Plan

1.0 Program Overview

1.1 Purpose

This document is the Federal Aviation Administration (FAA) fiscal year 2003 (FY-03) plan for attaining compliance with Section 508 of the Rehabilitation Act of 1973, as amended in 1998. This compliance plan provides the background, strategic alignment, approach principles, assumptions, products, benefits, and performance measures necessary to execute an agencywide Section 508 Compliance Program. In addition to past awareness activities, this plan will further inform managers and employees within the FAA lines of business (LOBs), staff offices (SOs), regions, and centers of Section 508 standards and requirements necessary to implement, comply, and institutionalize Section 508 within the FAA.

1.2 Background

On August 7, 1998, the President signed into law the Workforce Investment Act of 1998, which includes the Rehabilitation Act Amendments of 1998. Section 508 of the Rehabilitation Act Amendments requires that when Federal agencies develop, procure, maintain, or use electronic and information technology (EIT), they shall ensure that EIT allows Federal employees with disabilities to have access to and use of information and data comparable to the access and use of information and data by Federal employees who are not individuals with disabilities - unless an undue burden would be imposed on the agency. This is referred to as “comparable access” in the legislation. 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 comparable to that provided to the public who are not individuals with disabilities. If an undue burden can be justified and documented, the legislation still requires that an “alternative means of access” be provided for people with disabilities. The latter is defined in the legislation.

Section 508 requires managers to provide accessible EIT to employees with disabilities, to enable them to successfully do their jobs and enjoy the same benefits of training and career opportunities that are available to others in the workforce. Managers and employees are required to procure, maintain, develop, and use EIT to ensure that Federal employees and members of the public with disabilities have access and use of information and data - comparable to employees and members of the public without disabilities - unless it is an undue burden to do so.

Section 508 of the Rehabilitation Act Amendments of 1998 requires the Architectural and Transportation Barriers Compliance Board (known as the Access Board) to publish standards that define the terms and technical and functional performance criteria necessary for compliance. The Access Board is an independent Federal agency devoted to accessibility for people with disabilities. The Access Board is responsible for developing and maintaining accessibility standards for EIT. The standards developed by the Access Board were published in the Federal Register on December 21, 2000, as 36 CFR Part 1194.

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People with disabilities can sue agencies that fail to comply with Section 508 in court for non-compliance. The individual with a disability can file a complaint against the FAA and/or may sue the FAA in Federal court. This can lead to injunctive relief and attorney fees.

As of June 21, 2001, enforcement of Section 508 began with agencies being required to procure EIT in a manner consistent with the Access Board standards. Many agencies, as the first step to compliance, began to ensure that the Web sites complied with the Section 508 standards. Enforcement provisions of Section 508 apply only to EIT procured on or after June 21, 2001.

The FAA has implemented an active Section 508 Compliance Program. The following are specific Section 508 Compliance Program accomplishments in FY-02:

- Conducted Web site reviews and remediation:
 - Reviewed 60 Web sites (including top 20 Web sites for Internet and Intranet)
 - Reviewed 50,000 Web pages
 - Found 6 Web sites from the Intranet and Internet to be compliant
 - Found 5 Web sites from the Intranet and Internet to be 85% compliant
 - All FAA Web sites subject to expanded monitoring
- Evaluated and purchased AccMonitor Server software for monitoring Section 508 compliance for FAA and Department of Transportation (DOT)
- Provided agency coordination:
 - Designated Section 508 coordinators for each LOB, SO, region, and center
 - Developed Section 508 implementation plan
 - Conducted monthly meetings for all Section 508 coordinators
 - Established Section 508 Web site
 - Established FAA Section 508 guidelines
- Conducted extensive training:
 - Developed training modules for Section 508 history, procurement, Web, software, and video and multimedia
 - Developed training for Section 508 telecommunications; self-contained, closed products; and desktop and portable computers
 - Conducted “train the trainer” class
 - Trained 120 FAA and DOT personnel in Section 508
 - At DOT request, developed Section 508 Training Program for DOT personnel to be conducted in FY-03
- Revised the FAA Acquisition Management System (AMS) to incorporate Section 508 requirements:
 - Provided contracting language in AMS to reflect Section 508 requirements
 - Established Section 508 standard operating procedures (SOPs) for procurements

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1.3 Scope of EIT

The scope of Section 508 includes EIT that involves copiers, facsimile (fax) machines, and similar equipment. The term “information technology” is consistent with the definition of information technology in section 5002(3) of the Clinger-Cohen Act of 1996¹. This includes:

- Web-based Intranet and Internet applications and information,
- software applications and operating systems,
- telecommunication products,
- video and multimedia products,
- self-contained, closed products (kiosks, calculators, copiers, fax machines, automated teller machines, etc.), and
- desktop and portable computers.

1.4 Departmental Policy Statement

On June 14, 2001, Secretary Mineta issued a policy statement on access to EIT. The policy requires the DOT to provide access to all of its programs, services, and information to people with disabilities that is comparable to the level of access provided to others. It requires that the DOT’s EIT meet the Access Board’s² accessibility standards for people with disabilities, including employees and the customers being served, whenever procuring, developing, maintaining, or using EIT. This policy establishes the mandate that the DOT meet the standards, acquisition, and reporting requirements of Section 508.

The DOT has a target to achieve and maintain Section 508 compliance by November 30, 2003.

1.5 Strategic Alignment

Section 508 is one of the electronic government (E-Government) initiatives included in the President’s Management Agenda³. The goal of the FAA is to institutionalize Section 508 within the agency. Institutionalization of Section 508 means that the standards and requirements for its implementation will become a part of daily operations.

The FAA Section 508 Compliance Plan supports the E-Government goal contained in the FAA’s Information Technology Strategy for FY 2002-2005.

¹ Information technology means “any equipment or interconnected system or subsystem of equipment that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by the executive agency...The term information technology includes computers, ancillary equipment, software, firmware and similar procedures, services (including support service), and related resources...”

² The Architectural and Transportation Barriers Compliance Board, known as the Access Board, is an independent Federal agency devoted to accessibility for people with disabilities. On December 21, 2000, the Access Board issued accessibility standards for EIT under Section 508 of the Rehabilitation Act, as amended.

³ The President’s Management Agenda is targeted at improving the quality of services to citizens, businesses, governments, and government employees, as well as the effectiveness and efficiency of the Federal Government.

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During FY-02, the FAA has accomplished many Section 508 awareness, training, and compliance planning activities. However, in an effort to further facilitate the agency's compliance with the standards, the objectives of the Section 508 Program during FY-03 are to:

- train FAA managers and employees on the Section 508 standards,
- incorporate Web monitoring software tool into the Web content management process,
- conduct an agencywide assessment of Section 508,
- revise the agencywide compliance plan in order to determine resource requirements and execute actions identified in the assessment process, and
- understand, plan, and issue guidance, if necessary, for the level of funding required to ensure Section 508 compliance agencywide.

1.6 Guiding Principles

The following guiding principles and outcomes represent the vision for the FAA's Section 508 Program:

- Information, programs, and services are in compliance with the Section 508 standards.
- EIT within the agency will comply with the standards. This includes:
 - Web-based Intranet and Internet applications and information,
 - software applications and operating systems,
 - telecommunication products,
 - video and multimedia products,
 - self-contained, closed products (kiosks, ATMs, etc.), and
 - desktop and portable computers.
- Section 508 standards will be institutionalized within the agency.
- FAA employees and the public file few complaints about accessibility to EIT.
- Information, programs, and services meet or exceed high standards of quality.
- This plan is aimed at enabling, supporting, and achieving Section 508 compliance through the knowledge and skill of "requiring officials." "Requiring officials" include:
 - managers and staff persons with the authority to influence and/or commit Government funds,
 - integrated product team (IPT) members,
 - procurement officials,
 - contracting officers,
 - information resources management specialists,
 - civil rights personnel,
 - human resources personnel,
 - legal personnel,
 - management in headquarters, regions, and centers,
 - union representatives,
 - chief information officers (CIOs),
 - Web masters and developers, and
 - software developers.

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1.7 Approach

Each LOB, SO, region, and center shall have a Section 508 coordinator who has the responsibility to train, conduct an assessment, develop and execute a compliance plan, and gather and report information. The Office of the Assistant Administrator for Information Services and Chief Information Officer (AIO) will provide planning, coordination, training, and support necessary to attain Section 508 compliance.

2.0 Program Components

The FAA Section 508 Compliance Plan provides a comprehensive and integrated approach to achieve Section 508 compliance. It consists of the following components:

- Program Coordination
- Awareness and Training
- Assessment Process
- Compliance Planning and Implementation
- Compliance Reviews and Reporting

The figure below summarizes FAA's Section 508 Program:



Overview of FAA Section 508 Program

Each organizational component builds on the next component to reach Section 508 institutionalization in the agency. Throughout this process, internal and external reviews and reporting are necessary to monitor compliance within the program.

2.1 Program Coordination

The LOB, SO, region, and center Section 508 coordinators, under the leadership of the FAA Section 508 coordinator, will share information with the Section 508 points of contact (POCs) within the agency. It is the expectation that the LOB, SO, region, and center coordinators will

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mirror the implementation efforts of the FAA Section 508 coordinator. During FY-03, the Section 508 coordinators will work together to train pertinent FAA personnel, conduct an agencywide assessment, and plan further compliance activities.

2.2 Awareness and Training

The Section 508 training team has developed five training modules aimed at increasing the understanding and application of Section 508 standards among the FAA staff. These modules provide information on the:

- history of Section 508,
- procurement process within the agency,
- Web-based Internet and Intranet information and applications,
- software applications and operating systems, and
- video and multimedia products.

During FY-03, phase two of the training program will begin. During this phase, training modules will be developed that cover telecommunications products; self-contained, closed products; and desktop and portable computers. The training in FY-03 will include field organizations in an effort to provide awareness outside of headquarters staff.

Past awareness activities have included former Administrator Garvey signing a Section 508 policy that exists in the AMS that sets acquisition policy for Section 508 compliance. The Section 508 procurement team developed SOPs that provide guidance on procuring EIT that complies with Section 508. Additionally, the AIO Section 508 team:

- Participates in FAA forums to inform employees and managers of the Section 508 standards and requirements. This includes meetings to communicate the Section 508 SOPs to IPT members, managers, and employees.
- Prepares and publishes informational material to foster FAA Section 508 compliance. This includes the team's Web site and two FAA Intercom articles that heighten the awareness of the Section 508 standards. The FAA Section 508 Web site provides accessibility information, procedures, and processes for internal and external customers. The Web site address is <http://intranet.faa.gov/aio/508>.
- Maintains a Section 508 Help Desk that provides guidance to employees and managers who have inquiries relative to Section 508 standards.

2.3 Assessment Process

The Section 508 coordinators will work together to assess where FAA personnel are in their implementation of Section 508 within the agency. This is an assessment of EIT for compliance with Section 508 and a verification of employee awareness of Section 508 requirements. The assessment will be conducted with key stakeholders from areas such as procurement, information technology, Web development, human resources, and legal. AIO staff is developing an in-house automated tool to collect assessment findings. The results of the assessment will enable the Section 508 coordinators to further plan compliance activities.

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2.4 Compliance Planning and Implementation

Once an internal assessment is completed, each LOB, SO, region, and center will develop a plan to attain compliance with Section 508 standards and requirements. The compliance plan will demonstrate how each LOB, SO, region, and center will achieve and maintain accessibility of Web sites, telecommunications products, software and software upgrades, video and multimedia products, and self-contained and closed products on a long-term basis.

The DOT's CIO and the Office of Management and Budget (OMB) require the FAA Administrator to produce and maintain a Section 508 Compliance Plan. While this document represents the initial version of that plan, assessment activities and development of resource requirements by FAA organizations are expected to lead to further compliance planning and implementation of the activities identified during the assessment process.

2.5 Compliance Review and Reporting

The Attorney General of the Department of Justice (DOJ) has the authority to request biennial reports from Federal agencies to submit to Congress and the President. These reports usually provide information and data to support an agency's compliance effort with the Section 508 standards and requirements. AIO will request at least yearly feedback from the LOBs, SOs, regions, and centers on their Section 508 performance plans. Also, AIO will facilitate external requests (i.e., DOJ, DOT CIO, and other Federal agencies) for Section 508 compliance information and data.

3.0 Program Approach

3.1 Action Plan

The following table is an overview of the major milestones for FYs-03 and 04. While this plan specifically addresses FY-03, the FY-04 objectives are provided to illustrate follow-on program activities and will be reevaluated in relation to actual FY-03 accomplishments.

Program Component	Near-Term Objectives (10/01-6/03)	Mid-Term Objectives (6/03-10/04)
Program Coordination	<ul style="list-style-type: none"> Disseminate Section 508 information and data to agencywide Section 508 coordinators and POCs Determine financial impact on the FAA to ensure Section 508 compliance 	<ul style="list-style-type: none"> Collect best practices and lessons learned from other Federal agencies on Section 508 successes and implement within agency
Training	<ul style="list-style-type: none"> Train half of the regionally located employees and managers on the Section 508 standards 	<ul style="list-style-type: none"> Train the remainder of the regionally located employees and managers on the Section 508 standards
	<ul style="list-style-type: none"> Train 50-100 employees in headquarters and DOT operating administrations 	<ul style="list-style-type: none"> Train an additional 50-100 employees in headquarters
Assessment Process	<ul style="list-style-type: none"> Select and deploy an automated tool to review Web sites 	<ul style="list-style-type: none"> Incorporate the automated Web monitoring tool into the Web content management process
	<ul style="list-style-type: none"> Develop an agencywide assessment process to determine compliance with the Section 508 standards 	

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Program Component	Near-Term Objectives (10/01-6/03)	Mid-Term Objectives (6/03-10/04)
Compliance Planning and Implementation	<ul style="list-style-type: none"> Develop an agencywide Section 508 Compliance Plan 	<ul style="list-style-type: none"> Revise compliance plan
	<ul style="list-style-type: none"> Determine what actions need to be taken to ensure compliance in Web, software, video, multimedia, telecommunications, and self-contained and closed products 	
Compliance Review and Reporting	<ul style="list-style-type: none"> Review and monitor the success of the Section 508 Program 	<ul style="list-style-type: none"> Monitor the Section 508 Compliance Plan to determine progress in implementation
	<ul style="list-style-type: none"> Report information and data to external entities such as the DOT CIO and the DOJ 	<ul style="list-style-type: none"> Report information and data to external entities such as the DOT CIO and the DOJ

The dates in the preceding table are subject to change based on a management change in direction or lack of resources. A detailed project plan is available that shows proposed project tasks, start dates, and completion dates.

3.2 Roles

AIO has been assigned the leadership role and is actively working with the LOBs to ensure employees and customers have access to information and technologies throughout the agency. In a memorandum dated August 27, 2002, the CIO requested that each member of the Management Board designate a Section 508 coordinator. Under the leadership of the FAA's Section 508 coordinator, each coordinator will have the responsibility for: (1) identifying pertinent personnel and coordinating Section 508 training requirements, (2) conducting a Section 508 self-assessment, (3) developing and executing Section 508 compliance plans, and (4) responding to Section 508 information requests.

The following table summarizes the roles and participation for each program component:

The duties, skills, and scope of involved positions and organizations are described below. These duties should be incorporated into individual performance plans for accountability.

PROGRAM COMPONENT	TASK	PARTICIPATION	
		LOB/SO	AIO
Program Coordination	FAA-wide coordination and communications		X
	LOB, SO, center, and region coordination	X	
Awareness and Training	Awareness sessions	X	X
	Training planning and execution		X
	Facilitate FAA staff participation	X	X
Assessment Process	Assessment planning activities		X
	Tool development and support		X
	Assessment execution and reports	X	
	Review assessment reports		X
Compliance Planning and Implementation	Further compliance planning	X	
	Compliance execution activities	X	
Compliance Reviews and	Section 508 reviews and reporting to DOT, DOJ,		X

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Reporting	OMB, etc.		
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3.2.1 FAA Management Board

The FAA Management Board has overall responsibility for Section 508 compliance. AIO has the lead for coordinating, fostering, and monitoring Section 508 compliance agencywide. Executive responsibilities include:

- Fostering and promoting Section 508 compliance.
- Appointing the Section 508 coordinator for their organization.
- Ensuring that the organization's EIT complies with Section 508 standards.
- Participating in the planning and execution of compliance activities.
- Budgeting the resources necessary to institutionalize Section 508 activities.

3.2.2 Office of the Assistant Administrator for Information Services and Chief Information Officer (AIO)

AIO has the lead for coordinating, fostering, and monitoring Section 508 compliance agencywide. The FAA Section 508 coordinator, employed within AIO, provides leadership to the LOB, SO, region, and center Section 508 coordinators and manages the Section 508 Program implementation process. Specific responsibilities of the FAA Section 508 coordinator include but are not limited to:

- Providing reports to the FAA Administrator on the Section 508 Program's yearly accomplishments, planned accomplishments, and impacts on agencywide resources.
- Providing progress reports and ad hoc information to the Chief Information Officer (CIO), Office of the Secretary (OST), Department of Justice, and other Federal entities related to the implementation of Section 508.
- Working with OST to ensure that the FAA implementation efforts are consistent with departmental policy guidance.
- Providing programmatic and technical guidance and assistance to the LOBs, SOs, regions, and centers regarding the implementation of Section 508 of the Rehabilitation Act, as amended.
- Preparing policies and procedures for the development of requirements for promulgation by the FAA CIO.
- Providing guidance on the development of agencywide implementation plans for each LOB to ensure compliance with:
 - Web sites,
 - procurement/acquisition,
 - complaint processing,
 - telecommunications,
 - software,
 - video and multimedia,
 - self-contained, closed products, and

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- desktop and portable computers.

3.2.3 Section 508 Coordinators

The LOB, SO, region, or center Section 508 coordinator is the day-to-day manager of the Section 508 Program within his or her LOB or SO and represents all matters relating to the organization's Section 508 compliance. Specific responsibilities of the Section 508 coordinator include:

- Identifying pertinent personnel and coordinating Section 508 training requirements.
- Conducting a self-assessment of the organization's EIT to identify compliance shortcomings and planning corrective action.
- Planning and monitoring completion of corrective actions to attain compliance.
- Providing information and data requests to the FAA Section 508 coordinator upon request.
- Coordinating with other involved organizations and stakeholders.
- Working with their management team to resolve issues and align resources to attain compliance.

3.2.4 Section 508 Working Group

This group is made up of the Section 508 coordinators from the LOBs, SOs, centers, and regions. It includes the FAA Section 508 coordinator. Specific roles include:

- Serving as a clearinghouse for Section 508 issues, resolving those where appropriate and referring those that cannot be resolved to higher management.
- Establishing POCs and other contacts necessary to facilitate and institutionalize Section 508 compliance within the agency.
- Advocating Section 508 Program resources.
- Promoting technical teams (i.e., Web developers and software developers) to convene and resolve Section 508 technical issues.
- Overseeing the components and processes of FAA's Section 508 Program.
- Planning and controlling the execution of the FAA Section 508 Compliance Plan.

3.2.5 Chief Information Officers (CIOs)

The LOB and SO CIOs are responsible for planning, directing, and executing most of the EIT resources within the agency. The CIOs have a role in ensuring that Section 508 compliance is addressed in information technology planning and execution activities for their organization. Specific roles include:

- Contributing to planning and strategizing of Section 508 compliance through the FAA CIO Council.
- Fostering and promoting Section 508 compliance within their organization.
- Supporting and promoting the availability of resources for Section 508 compliance.
- Providing guidance and support to their organization's Section 508 coordinator – when directed by their organization's management.

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3.2.6 Managers

The FAA business managers or program managers accountable under resource management organizations should address non-EIT items. Under Section 508, non-EIT items such as faxes, copiers, televisions, etc., have to be in compliance with the standards.

3.2.7 Resource Management Organizations

The FAA's LOBs and SOs have resource management organizations (referred to as the "dash ten" organizations) whose purview includes aspects of EIT acquisition and management. In particular, they acquire certain EIT such as copiers, fax machines, and other office equipment that needs to be Section 508 compliant. As a result, they have a role in ensuring that Section 508 compliance is addressed in information technology planning and execution activities. Specific roles include:

- Contributing to planning and strategizing Section 508 compliance through their management team.
- Fostering and promoting Section 508 compliance within their organization.
- Supporting and promoting the availability of resources for Section 508 compliance.
- Providing guidance and support to their organization's Section 508 coordinator – when directed by their organization's management.

3.2.8 CIO Council

The role of the FAA CIO Council includes:

- Providing guidance and direction to the development of components and processes necessary to ensure agencywide Section 508 compliance.
- Reviewing, commenting, and supporting the Section 508 assessment, compliance planning, and implementation processes.
- Recommending plans of action to facilitate the institutionalization of Section 508 agencywide.

3.2.9 Integrated Product Teams (IPTs) and Other Developers

The IPTs must plan and execute their acquisitions in compliance with Section 508. Policy guidance and Section 508 procurement SOPs are located in the AMS.

3.2.10 Information System Managers (ISMs)

The ISMs ensure that Section 508 compliance is attained in their systems. Budgets for their systems need to include Section 508 resources. This includes completion of OMB Form 300s, which have a question on whether the system is Section 508 compliant.

3.3 Key Program Assumptions

Successful implementation of the Section 508 Program is based on the following assumptions:

- LOBs, SOs, regions, and centers designate appropriate personnel as Section 508 coordinators.

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- Section 508 coordinators identify and train the appropriate personnel to assist in the development of a compliance plan.
- Appropriate FAA personnel participate in the Section 508 training classes.
- Section 508 coordinators work with the appropriate personnel to conduct an assessment within their LOB, SO, region, or center.
- Management supports the assessment process within the agency.
- FAA personnel respond to the assessment questions in a timely manner.
- Management provides resources to support the implementation of the compliance plan.

3.4 Acquisition Management System (AMS)

AIO will explore further augmentation of the FAA's AMS to provide guidance and direction on attaining Section 508 compliance. These processes would build upon the policy already in the AMS for Section 508 compliance. This may include a description of Section 508 requirements and sources of information for FAA acquisition programs. It may also include Section 508 as a review item within the Joint Resources Council acquisition reviews (for larger investments).

3.5 Program Products and Benefits

The Section 508 Program will make the FAA information and resources available in multiple forms, enabling broader participation in FAA business processes. Short-term benefits will be realized from training FAA employees – FAA personnel and management will become knowledgeable of the standards and be able to apply this knowledge to understand how to ensure Section 508 compliance within the agency. Training will assist the LOBs in further planning and implementation of Section 508 compliance. FAA personnel will understand what is required to ensure that people with disabilities have access to information, programs, and services.

Long-term benefits are:

- Compliant FAA Web sites developed in accordance to the Section 508 standards and the process to ensure compliance is incorporated into the Web content management procedures.
- Compliant FAA software and operating systems and all enhancements and modifications are developed in accordance to the Section 508 standards.
- Compliant products that are developed and procured in accordance to the Section 508 standards, including video and multimedia, telecommunications, desktop and portable computers, and self-contained and closed products.
- Enhanced productivity and participation of employees with disabilities.
- Reduced barriers to employment for persons with disabilities.
- Minimized FAA liability from potential non-compliance with Section 508.

3.6 Resources

AIO and the FAA organizations are allocating resources to Section 508 compliance. AIO is devoting 2 labor-years to Section 508 in FY-03. Other FAA organizations have named their Section 508 coordinators or are in the process of doing so. In FY-02, LOBs, SOs, regions, and centers assigned support in the form of Web developers to ensure that the top 20 Web sites are in compliance with the standards. In FY-03, other resources will be involved including those for

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Web site changes (labor time of Web developers and Webmasters), travel for training, and other expenditures.

A November 2000 study estimates the total Federal cost of Section 508 compliance with Access Board standards at a range of \$85 million to \$691 million⁴ (lower bound to upper bound of costs) governmentwide. This economic assessment was written by the Access Board, which breaks out the costs associated with compliance of the standards by EIT category. The economic assessment can be viewed at <http://www.access-board.gov/sec/508/508index.htm>. This report is comprehensive, therefore, it is necessary for the FAA to determine the overall impact of Section 508 within the agency. During FY-03, the FAA Section 508 coordinator will conduct further research to determine the impact within the agency. If necessary, guidance will be issued to assist the LOBs, SOs, regions, and centers to determine costs. In addition, the assessment process conducted by the LOBs, SOs, regions, and centers should assist each in determining the costs to obtain compliance.

Complying with the standards will have an impact on most EIT budgets for computer hardware and software, Web sites and Web applications, multimedia, faxes, printers, and telephone equipment, and will also impact non-EIT budgets for video (including captioning and video description), accessible training materials and documentation, copiers, and televisions. There is an exemption for Section 508 compliance for EIT that is located in spaces frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment. During initial research, it appears that, in the long run, some kinds of Section 508 costs will not be visible or easy to track since industry is likely to build Section 508 compliance into the systems they sell (such as copiers, fax machines, etc.). Newly acquired systems and commercial-off-the-shelf capabilities should include Section 508 compliance in the contract terms. Requiring officials may wish to track their incremental Section 508 costs by structuring their procurements accordingly. It is anticipated that some FAA programs and acquisitions will experience initial costs in attaining Section 508 compliance, particularly where existing systems or Web pages need to be modified to attain compliance. Further research will be conducted to determine the impact and, if necessary, issue guidance.

3.7 Metrics

During FY-03, the FAA Section 508 coordinator will document the following metrics to support program implementation:

- Number of FAA personnel that have taken Section 508 training
- Number of DOT personnel that have taken Section 508 training
- Number of Web sites that comply with the Section 508 standards for the Web
- Completion of an agencywide assessment
- Completion of an agencywide compliance plan

⁴ Electronic and Information Accessibility Standards: Economic Assessment, EOP Foundation, November 2000.

This FAA document is being issued in draft, subject to revision, and does not represent official FAA policy.

FAA Section 508 Compliance Plan

3.8 Risks and Risk Mitigation

The following table summarizes the perceived risks to attaining Section 508 compliance and identifies mitigation strategies for these risks:

Risks	Risk Mitigation Strategies
Insufficient resources available	<ul style="list-style-type: none"> • The LOBs will work with the Assistant Administrator for AIO to arrange resources • LOBs, SOs, regions, and centers plan for Section 508 compliance within their annual systems budget
Lack of on-going Management Board support	<ul style="list-style-type: none"> • Consider including Section 508 as a checklist item for JRC reviews of major acquisitions • Periodic or annual reports or briefings to the Management Board on FAA’s progress on Section 508 compliance
Lack of support and collaboration from the LOBs, SOs, system managers, IPTs, regions, and/or centers for Section 508 compliance	<ul style="list-style-type: none"> • Awareness and training • Empowered Section 508 coordinators from each LOB, SO, region, and center • Strong Management Board support • Periodic reports to FAA executive management on Section 508 compliance status
FAA staff or “requiring officials” are unaware of the Section 508 standards and do not participate in the training activities offered by AIO	<ul style="list-style-type: none"> • Training • Awareness activities • Briefings • AIO’s Section 508 Web site • Collaboration with FAA CIOs and resource management organizations • Section 508 coordinator’s active involvement in EIT activities within the LOB, SO, region, or center

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