



Highlights of the 508 Compliance Revision

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Overview



- Background on 508 and standards
- Highlights of key changes
- Resources for learning more
 - Links posted on WAG site
 - [Web Accessibility Group Main Page](#)

Background: Statutes

Section 508 addresses technical accessibility.

Part of the 1973 Rehabilitation Act, as amended in 1998.

Related:

- Sections 501, 503, and 504
- American with Disabilities Act (ADA)
- Twenty-first Century Communications and Video Accessibility Act (CVAA)

Statute = law

Standards = Requirements, functional performance criteria (FPC)



Background: Standards

Standards set by US Access Board.



Standards for 508 updated January 18, 2017 – “The Final Rule”

- Enforcement beginning January 18, 2018
- Revised standards address TWO statutes – 508 and 255 (part of Communications Act)

Why update?

2000

- Technology discrete (copier, desktop, phone, etc.)
- Standards addressed by hardware
- Not aligned with technical standards set by other organizations (ex: WCAG 2.0)



To address changing world!

2017

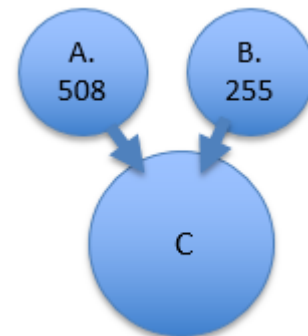
- Convergence of technology;
- Standards now focus on function, independent of platform.
- Aligned with existing standards



Organization of standards

Three sections, appended to original standard (36 CFR [Code of Federal Regulation], part 1194)

- Appendix A
 - 508 application and scoping (E101-E208.1)
- Appendix B
 - 255 application and scoping (C101-C206.1)
- Appendix C
 - Functional Performance Criteria and Technical requirements (301-702.10.1)



Ch. 3 Functional Performance Criteria (301-302.9)

Ch. 4 Hardware (401-415.1.2)

Ch. 5 Software (501-504.4)

Ch. 6 Support Documentation and Services (601-603.3)

Ch. 7 Referenced Standards (701-702.10.1)

Key Changes



- Incorporation of WCAG 2.0 by reference
 - Broadened application of WCAG 2.0
- Clearer description of covered content (Appendix A)
- Functional performance criteria
- “Safe harbor” for legacy-ICT (unless modified)

Web Content Accessibility Guidelines (WCAG) – international standards for web, set by World Wide Web Consortium (W3C).

“WCAG 2.0 is a stable, referenceable technical standard. It has 12 guidelines that are organized under 4 principles: perceivable, operable, understandable, and robust. For each guideline, there are testable *success criteria*, which are at three levels: A, AA, and AAA.”

- Source: [Web Content Accessibility Guidelines Overview](#)

Incorporation of WCAG 2.0



- WCAG 2.0, levels A and AA, now incorporated by reference into 508 standards
- Application of WCAG 2.0 broadened to apply to non-web ICT as well

Broadened application of WCAG 2.0



WCAG 2.0 standards also apply to non-web ICT, such as

- Electronic documents (such as instructional materials)
- Software (such as learning platforms)

Adjustments are identified

- Word substitution
- Exceptions

Word substitution example



Word substitution

E205.4.1 Word Substitution when Applying WCAG to Non-Web Documents. For non-Web documents, wherever the term “Web page” or “page” appears in WCAG 2.0 Level A and AA Success Criteria and Conformance Requirements, the term “document” shall be substituted for the terms “Web page” and “page”. In addition, in Success Criterion in 1.4.2, the phrase “in a document” shall be substituted for the phrase “on a Web page”.

Word substitution (summary)

“Document”

replaces

“Web page” or “page”

Exception example



Exception

E205.4 Accessibility Standard. Electronic content shall conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1).

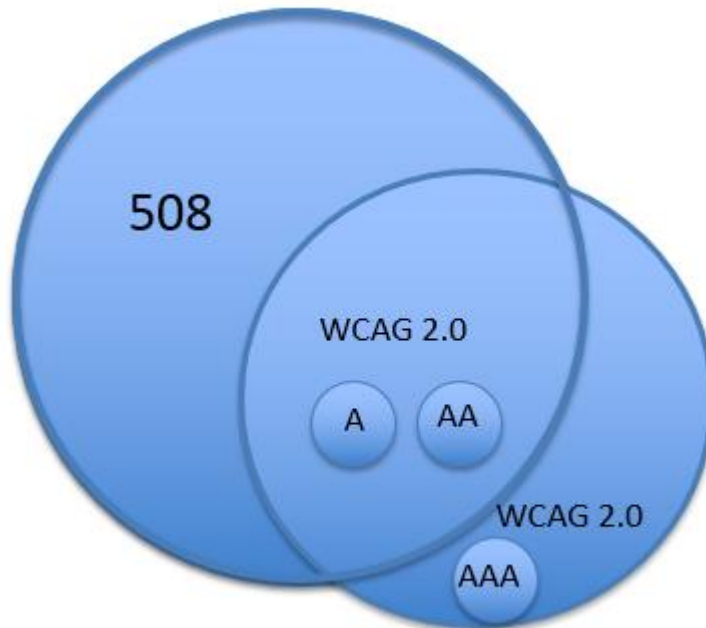
EXCEPTION: Non-Web documents shall not be required to conform to the following four WCAG 2.0 Success Criteria: 2.4.1 Bypass Blocks, 2.4.5 Multiple Ways, 3.2.3 Consistent Navigation, and 3.2.4 Consistent Identification.

Exception (summary)

Identifies Web navigation requirements that do not apply to non-Web documents.



Relationship of 508 and WCAG 2.0



Advantages of WCAG 2.0



- Global standard
- Excellent resources for implementation
- Addresses issues not covered in original 508 standards
 - Low contrast text
 - Meaningful sequence
 - Fixed size text
 - Clarity and consistency
 - Site navigation
 - Helping users correct mistakes

Covered electronic content (E205)



Public Facing

Agency Official Communication

- A. An emergency notification;
- B. An initial or final decision adjudicating an administrative claim or proceeding;
- C. An internal or external program or policy announcement;
- D. A notice of benefits, program eligibility, employment opportunity, or personnel action;
- E. A formal acknowledgement of receipt;
- F. A survey questionnaire;
- G. A template or form;
- H. Educational or training materials; or
- I. Intranet content designed as a Web page.

Functional Performance Criteria (302)



To be used when technical requirements do not address function and/or when assessing a claim of equivalent facilitation.

302.1 Without Vision.

302.2 With Limited Vision.

302.3 Without Perception of Color.

302.4 Without Hearing.

302.5 With Limited Hearing.

302.6 Without Speech.

302.7 With Limited Manipulation.

302.8 With Limited Reach and Strength.

302.9 With Limited Language, Cognitive, and Learning Abilities.

Safe-harbor provision



E202.2 Legacy ICT. Any component or portion of existing ICT that **complies with an earlier standard** issued pursuant to Section 508 of the Rehabilitation Act of 1973, as amended (as republished in Appendix D), and that has **not been altered** on or after January 18, 2018, shall not be required to be modified to conform to the Revised 508 Standards.

Alteration. A change to existing ICT that affects interoperability, the user interface, or access to information or data.

A final word on “final rule”

- Chapter numbering is sequential
- Read and apply linearly – don’t cherry-pick
 - Especially important when looking at exceptions.
 - Also true for WCAG 2.0
- Use resources available to clarify
- Don’t wait to get started!

Resources

[Text of the standards and guidelines](#)

[Webinars, US Access Board](#)

[Revised Section 508 Toolkit](#)

[Web Content Accessibility Guidelines \(WCAG\) Overview](#)

[WCAG 2.0](#)



Questions?



[Web Accessibility Group Main Page](#)

