

### THE SECRETARY OF VETERANS AFFAIRS WASHINGTON

July 29, 2022

The Honorable Robert P. Casey, Jr. Chairman
Special Committee on Aging
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

Thank you for your June 6, 2022, cosigned letter to the Department of Veterans Affairs (VA) regarding VA's compliance with Section 508 of the Rehabilitation Act of 1973. I appreciate the opportunity to respond to your letter.

VA shares your view of how critical Section 508 compliance is, as we strive to provide the best support to all users of our websites, including the Nation's disabled Veterans. As you note, the VA Website Accessibility Act of 2019 requires the VA to report "A list of website, file, or web-based application (sic) that is not accessible to individuals with disabilities in accordance with Section 508 of the Rehabilitation Act of 1973." The enclosures provide information that you requested in your letter.

VA's web ecosystem is quite large. To address the reporting requirement, we based our Section 508 compliance report on the list of "websites" enumerated in our content management systems. This approach does not consider the fact that a small number of web pages receive the majority of visits by end users. Therefore, VA prioritized 508 compatibility efforts having the greatest impact by focusing on the web pages that receive the most visits. Among the top 1000 most used pages across the VA, 89% of the pageviews are served by either the modern VA.gov platform (49%) or the MyHealtheVet platform (32%); both receive outstanding accessibility compliance scores of 95% or higher.

Specifically, the Department invested in strong accessibility features for both platforms. By prioritizing the accessibility of these pages and tools, we can maximize our improvements and benefit more Veterans sooner. In future versions of our Section 508 compliance report, the Department will seek to match compliance reporting to the measures we believe best reflect the overall accessibility of VA's web presence (i.e., by taking into account the relative usage of the pages and tools).

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As VA continues to improve accessibility, we are digging deeper into the "usage graph" and addressing pages with fewer page views to increase compliance.

In addition to identifying specific web pages further down the usage graph, we are using the following additional approaches to improve our compliance:

- 1. Reducing duplicative content across 138 VA medical center sites by migrating them to the modernized VA.gov platform.
- 2. Ensuring consistency and accessibility across sites and enable editors to access only the content that they need to edit.
- 3. Conducting daily accessibility scans of high usage sites to alert production teams of any non-compliance within 24 hours at which time we take immediate steps to begin remediation.

While VA has made progress, there is still much more work to be done. For example, VA plans to employ the same approach with sites on VA's internal staff-facing intranet network. Implementing webpage usage statistics on our most critical intranet sites will allow more precise focus and prioritization. Until usage analytics are in place, our improved internal processes enable us to capture webpages that most directly impact employees. When employees encounter accessibility issues with websites, they are able to enter trouble tickets via YourlT (ServiceNow) where we have Tier 1 and Tier 2 support. This ServiceNow Tier support structure has processes in place to address employee needs and to focus remediation. To date, VA has resolved 1,138 tickets, for which 52 were incident related.

Other key elements of our remediation strategy are increasing our partnerships with VA Administrations to supplement their remediation activities through acquisitions, training, development methodologies and processes. We will leverage our Web Governance Board to establish and enforce standards for publishing and maintaining websites and applying technical expertise where needed.

As we continue to improve our websites, we also have made significant progress with kiosk accessibility. In May 2022, the national deployment of the Patient Check-In (PCI) web-based tool began to rollout. By September 2022, PCI will "go-live", indicating that it is available for every VISN to deploy for Veteran use. In the PCI redesign, accessibility was built-in using Web-Content Accessibility Guidelines (WCAG) 2.1, which addresses cognitive disabilities as a foundational part of its architecture. The application is regularly tested with disabled Veterans and accessibility experts, including on-site visits at our pilot sites, to ensure that the application works in context. Until implementation is complete, Veterans with accessibility needs may complete appointment check-ins by seeing a staff member. In addition, Veterans without mobile devices can receive assistance from a staff member.

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In closing, the Department stresses the importance of transparency in our efforts to ensure our websites are Section 508 compliant, and in all our work.

Thank you for your continued support of our mission.

Sincerely,

Denis McDonough

**Enclosures** 

# VA Responses to Section 508 Compliance Questions

## Request 1: Please resubmit a revised VA Website Accessibility Act report containing the omitted information, including:

a. Detailed information for remediating the National Cemetery Administration (NCA) and Veterans Benefits Administration (VBA) websites.

<u>VA Response</u>: The revised NCA Section 508 compliance report is attachment 1 to this enclosure. The information for the revised (VBA) Section 508 compliance report is included below.

VBA requested funding and will execute a remediation response plan to reduce and eliminate accessibility defects impacting VBA-owned and operated websites, documents and files (excluding SharePoint).

VBA established a target completion timeline which will be conducted in multiple phases listed as follows:

- Phase 1: Modifying Internal Controls
- Phase 2: Training
- **Phase 3:** Integrated Project Team/Website Remediation

#### Phase 1: Modifying Internal Controls

On June 8, 2022, VBA restricted site access to personnel of the Department of Veterans Affairs' Office of Information Technology (OIT) and the web managers of VBA's Strategic Engagement (SE) Team. Each VBA central office (VBACO) business line and each of the 56 regional offices (RO) were charged with designating a primary and secondary site user for each business line and/or RO. Each newly appointed site user was provided with training and resources provided by the VA Web Content Management Support team and the VA Section 508 office.

After completing the necessary training for Section 508 compliance, site users are allowed to update web pages but not publish them. Users of the site will contact SE web managers who oversee VBA's website and intranet pages to evaluate content for Section 508 compliance. Throughout the remediation process, VBA will continue to train site users (Phase 2), monitor training progress and provide additional support as appropriate.

#### Phase 2: Training

Beginning July 11, 2022, VBA will plan twice monthly (2x/month) virtual training sessions with the VA Section 508 office staff, RO and VBA business lines on the following areas to reinforce and consistently refresh knowledge, skills, and abilities:

- Web pages
- Meta-tags, name-role issues, parsing
- Alt text
- Headings
- Captions
- Page titles
- Section titles

#### PDF issues:

- Self-paced
- Creating Accessible PDFs with Adobe Acrobat Pro
- User Training Virtual Instructor-Led
- Accessible Adobe PDF Document Training
- Introduction to CommonLook Office
- Creating Accessible Documents Using CommonLook PDF
- Accessible Microsoft Word Document Training

#### Phase 3: Integrated Project Team (IPT) and Website Remediation

- VBA web managers will immediately begin modifying web pages, with future attention dedicated to PDFs, to ensure Section 508 compliance. VBA will establish an IPT, including a site user from each VBA central office, RO and VBA's web managers on or before July 11, 2022.
- The 508 Compliance IPT will meet bi-weekly to accomplish the following:
  - Identify web pages and documents that are outdated. The term "outdated" refers to all content greater than or equal to 2 years old or content that previously supported a program/initiative that has since expired or terminated.
  - Identify PDFs that are outdated.
  - Identify files that may be duplicative in nature (e.g., stored in another VA system of record or replicated on multiple VA websites) or those representative of a previous campaign that has since concluded/expired.
  - Identify web pages and documents on public facing (internet) and private facing (intranet) web pages and PDF documents. SharePoint websites are excluded.
  - Resolve issues escalated by VBA web managers as appropriate.
  - o Consolidate monthly report of activities for VBA senior leadership.
  - Benchmark progress.

b. Detailed information on how VA will involve a range of stakeholders, including people with disabilities and their advocates, in soliciting accessibility problems and testing remediated websites.

<u>VA Response</u>: VBA will work with VA internal partners to ensure training, resources, support and feedback for conducting Section 508 remediation. The following VA internal partners include but are not limited to:

- VA web governance board
- OIT digital services
- VA Section 508 office

Including persons with disabilities in the development process is a foundational ethic in how the VA.gov team works every day. We take an "accessibility beyond compliance" stance to ensure the usability of the accessibility work that we do. We accomplish this by:

- Doing research with blind, low vision, and disabled Veterans and Veterans who use assistive tech.
- Ensuring that our designers take a "mobile first/accessibility first" approach to all designs.
- Building with the VA Design System (https://design.va.gov/) which has accessibility built in.
- Complying with Web Content Accessibility (WCAG) 2.1 AA criteria (https://www.w3.org/TR/WCAG21/), a higher version than is officially required.
   We were keen to upgrade to 2.1 to include criteria for mobile and considerations for users with cognitive disabilities.
- Ensuring that we do not ship products that have any "launch blocking" critical accessibility issues.
- Submitting all new development to the VA Section 508 office for official audits.
- Continually monitoring the VAMC ongoing Drupal-based content creation process and notify the production team of any accessibility errors within 24 hours.
- Meeting monthly with representatives from the VA 508 office, Blinded Veterans
   Association, and National Association of Blinded Veterans to hear their concerns
   and share our latest work.

The VA.gov platform upgraded to WCAG 2.1 AA in July 2021. This exceeds the official government standard version of WCAG 2.0. Additionally, the VA.gov team recruits Veterans with a wide range of disabilities to participate in our research process to ensure our digital products are usable by all Veterans.

 As of right now, approximately 12% of our research sessions have been with assistive tech users.

- About 20% of our research participant database consists of assistive tech users, and that number is increasing.
- Researchers are requesting a smaller percentage of assistive tech users than the database supports, but it is incumbent on the research plans to make sure assistive tech users are included.
- We have made it a priority to maintain a healthy roster of assistive tech users as research participants, we have increased our roster by more than 20 times its initial size since Dec 2021.
- Here is a quote from a research session with a blind Veteran: "I would honestly like to say... the whole development team working on the VA.gov web site I find this whole thing absolutely wonderful because we actually get input in how it's going to work rather than being forced to work within a page that was designed for sighted people. Even though we had a problem here [testing] I understand it's beta, plus Zoom plus the phone, plus other things you're dealing with none of that bothered me. I just want to make sure you get the info to make it better for people who use VoiceOver'."
- c. Specific details on how VA is going to prioritize which websites it fixes first, as well as remediation timelines for both the entire VA and each organizational subdivision.

<u>VA Response</u>: VBA will prioritize the following web pages for remediation due to high traffic volume. Please see the following chart for VBA's overall remediation timeline.

- Landing page
  - benefits.va.gov/benefits/
- GI Bill
  - benefits.va.gov/gibill/
- Lenders Handbook VA Pamphlet 26-7
  - https://benefits.va.gov/warms/pam26 7.asp
- Insurance
  - benefits.va.gov/insurance/valife.asp
- Compensation
  - benefits.va.gov/compensation/rates-index.asp
- All remaining content which requires Section 508 compliance updates

<u>Summary Timeline</u>: See the following chart for a listing of anticipated tasks to complete remediation.

Action Item	Due	Completed (Yes (Y)/No (N)/In Progress (IP))
Phase 1: Modifying Internal Controls	6/1/2022	Y
Restrict VBA TeamSite Access	6/8/2022	Υ
Complete Phase 1: Modifying Internal Controls	6/8/2022	Y
Send tasker for new TeamSite primary and secondary site users	6/1/2022	Y
Initial Section 508 training for VBACO business lines and regional offices	6/17/2022	IP
Receive approved list of TeamSite primary and secondary site users	6/17/2022	IP
IPT Field Request Email Solicitation	6/21/2022	N
Establish a Standard Operating Procedure (SOP) for Section 508	6/30/2022	IP
IPT Kick Off Meeting	7/11/2022	N
Add site users to VBA Communications Hub	7/11/2022	N
Phase 2: Initiate training	7/11/2022	N
Establish a standardized procedure for vetting access of new web managers, develop a process for the accountability of compliant materials, compliance checks, and testing of new web pages or PDFs or updated using evaluation tools	8/13/2022	N
IPT Bi-Weekly meeting	Every two weeks	Ongoing
IPT and website remediation close out	6/15/2025	N
Provide high level rollup of activities in VBA digital media monthly report	Monthly	Ongoing

The overall 8% is a result of less compliant sites influencing sites at higher levels. For example, 207 of 279 VHA websites have compliance levels above 80%. Although overall Internet conformance is 8%, this rate does not offer an accurate depiction of compliance levels most frequented by Veterans. Rather than focus on websites, resources target the most frequented webpages as the point of Veteran usage, revealing higher levels of compliance.

86% of visits to VA websites are to VA.gov and MyHealtheVet, which have compliance levels at 97% or higher.

- Reduced duplicative content across 138 VAMC sites.
  - Ensures consistency and accessibility across sites and enable editors to only access what they need to edit.
  - Over 240K duplicative words eliminated.
  - Ongoing daily accessibility scans of high usage sites to alert production teams of any non-compliance within 24 hours at which time we take immediate steps to begin remediation.
  - 188 Vet Center sites launched including 212 Community Access Points.
  - Over 400 legacy pages turned off and redirected to new, more robust 508 compliant pages.
  - Ongoing daily accessibility scans of high usage sites to alert production teams of any non-compliance within 24 hours at which time we take immediate steps to begin remediation.

Although overall intranet conformance is at 6%, the intent is to determine webpage usage levels by employees to depict compliance levels more accurately. Currently, 22% of websites are at 80% compliance or higher. Implementing webpage usage statistics on our most critical intranet applications will allow more precise focus and prioritization. Until usage analytics are in place, improved internal processes are leveraged to capture webpages directly impacting employees.

- ServiceNow resources/processes setup to address employee needs.
  - Trouble Tickets provide areas to focus remediation.
    - In 2021: 3788 tickets / 198 were incident related.
    - To date: 1,138 tickets / 52 were incident related.
    - Majority of tickets related to support, audit requests, training, etc.

d. Please also provide copies of compliance audits completed by VA's Section 508 office that provide supporting evidence for the compliance gaps or barriers to 14 Section 508 compliance identified in VA's plans.

**VA Response:** : See attachments 2 and 3 for this information.

Request 2: In VA Central Office and the Office of Information and Technology's report to Congress, the Department states that it will "[ a ]dvocate for the creation of a VA Accessibility Offic[ e ]" as part of its Section 508 remediation plan. This office "will provide policy and training support to the enterprise as well as the operational tasks of assisting the enterprise in the remediation of accessibility issues." It would also "combine the Section 15 501, Section 504 and Section 508 offices" into the new enterprise-wide office. Please provide an update on the status of this office and a timeline for its establishment, and answer the following questions:

a. Which office or offices at VA currently has responsibility for overseeing the VA's Section 508 remediation efforts? Please describe how that office oversees the entire agency, and how individual VA organizations like VHA, VBA and the National Cemetery Administration report back to them on their Section 508 efforts.

<u>VA Response</u>: We are evaluating a department-wide Accessibility Office to handle all accessibility concerns, including those related to document remediation, website and app compliance, audio description and captioning. That evaluation includes but is not limited to:

- Organizational placement/ownership (508 Compliance not exclusive to OIT)
   Resources, budget, span of control.
- Potentially shifts accountability from content owners (may require policy change.)
- An examination of possible unintended consequences (increasing tech debt and compliance delays).

The Section 508 office is limited in mission and in scope and as a part of OIT, limited in influence. The Section 508 office does not do remediation, nor focus on usability, as these are outside the Revised 508 Standards. The VA Accessibility Office would include the 508 office and other offices focused on access to VA services and information. The Accessibility Office would focus on all aspects of accessibility at VA, but as it relates to digital products would be the gatekeeper for agency-wide contracts for remediation, tools, and training on plain language, technical compliance, and other areas of concern.

b. Are there specific projects, including but not limited to VA's Electronic Health Record Modernization contract, that are subject to a different Section 508 reporting process than the rest of VA? If so, what is the justification for setting up a different reporting process?

**VA Response**: There are no differences in Section 508 reporting.

c. In what specific ways would a central VA Accessibility Office help VA improve its Section 508 compliance and remediation process compared to the current structure?

<u>VA Response</u>: As the enterprise solution, the VA Accessibility Office will consult with all VA administrations and staff offices. This office will educate leaders and staff at all levels that accessibility is mandatory and is more than section 508. The effort to retrain VA employees will include:

- 1. Section 508
- 2. Plain Language Writing Act
- 3. 21st Century Integrated Digital Experience Act
- 4. VA Web Accessibility Act (internet, intranet, kiosks)
- 5. Access beyond digital (not everybody has a cell phone or computer)
  - ii. Create enterprise-wide mandatory training requirements for:
    - 1. Recurring training for content creators
    - 2. Part of all VA staff and contractor performance requirements and evaluations
    - 3. How to resolve the easy problems on the web, pdf, etc.
    - 4. Beyond 508 technical compliance, plain language; and access (alternative languages, alternative formats, physical access, etc.)

Request 3: Please describe what steps VA is currently taking or will take to engage with groups representing different classes of disabilities. How does VA plan to broaden its current outreach to be more inclusive of different types of disabilities, including but not limited to the ones outlined in this letter?

<u>VA Response</u>: The Veteran service organizations (VSOs), along with State, county and other local Veteran service representatives are trained to help Veterans understand and apply for any VA benefits they may be entitled to including compensation, education, vocational rehabilitation and employment, home loans, life insurance, pension, health care and burial benefits. As part of this process, any accessibility needs that arise are addressed and/or communicated to appropriate VA offices. VSOs also assist with determining accessibility solutions in areas of Section 504 and Section 508. The Section 508 Office partners with VSOs (including Blind Veterans Association) as they serve as the primary conduit to identify Veteran's accessibility needs and ensure those needs are addressed appropriately.

Due to similarities between Section 504 and 508, the VSO relationship eliminates potential confusion and delays in issue resolution. For example, most revealed needs were for accommodations (Section 504) including alternative formats and business process changes, not Information and Communication Technology (ICT) (Section 508). Because accessibility needs vary, collaboration with those organizations directly

connected to Veterans is the most efficient way to address needs expeditiously. The Section 508 Office is collaborating with VSOs (and the Blind Veterans Association) on ways to improve communication and increase awareness. Introducing separate engagement channels will require Section 508 additional staff and potentially overcomplicates issue resolution (Section 504 and Section 508 require different types of expertise/experience). In addition, the Section 508 is re-engaging VSOs to improve Veteran communications in both directions, from the Veterans to the VA and from VA to Veterans.

The VA.gov platform upgraded to WCAG 2.1 AA in July 2021. This upgrade exceeds the official government standard version of WCAG 2.0. In addition, the VA.gov team recruits Veterans with a wide range of disabilities to participate in our research process to ensure our digital products are usable by all Veterans.

- As of right now, approximately 12% of our research sessions have been with assistive tech users.
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- Following is a quote from a research session with a blind Veteran: "I would honestly like to say... the whole development team working on the VA.gov web site I find this whole thing absolutely wonderful because we actually get input in how it's going to work rather than being forced to work within a page that was designed for sighted people. Even though we had a problem here [testing] I understand it's beta, plus Zoom plus the phone, plus other things you're dealing with none of that bothered me. I just want to make sure you get the info to make it better for people who use VoiceOver."

Request 4: During the March meeting, VA informed our staff that a lapsed contract had rendered the Department unable to scan its websites for compliance with Section 508 since October 2021. Contracting plays a major role in Section 508 compliance, both in the form of remediation and in the form of delivering accessible novel technology.

a. Please describe how the VA uses contractors and subcontractors to monitor and remediate Section 508 compliance problems with existing technology.

<u>VA Response</u>: Regarding contractor or subcontractor use in general, contract language and agency policy require compliance with Section 508 for all content

owners including those providing these services. For contractor remediation activities, automated tools provided code checking for DevSecOps developers, specifically, Application Programing Interfaces (APIs), compliance verification browser Extensions and automated scanning tools, which are employed to support remediation.

b. Please provide a list of all contracts, including task orders, related to Section 508 monitoring or remediation that have lapsed for any amount of time since January 1, 2019. For each of these lapsed contracts, please describe the capacity that was lost and the services/projects that were delayed while the contract was lapsed.

<u>VA Response</u>: In September 2021, VBA awarded a contract to a vendor to perform Section 508 monitoring of VBA's website. Due to the vendor's failure to comply with the terms agreed upon in the initial task order, the CO canceled the task order. Since September 2021, VBA has been without a local Section 508 monitoring service.

There was only one lapsed contract: Contract number 36C10B18C2746 / VA118-18-R-0143. As a result, the below capacity was lost or degraded:

- Inability to conduct monthly automated scanning compliance assessments for 792 Internet/Intranet web sites for Veterans Health Administration (VHA), Veterans Benefits Administration (VBA), VA Central Office (VACO), and National Cemetery Administration (NCA) combined.
- Inability to collect timely website/webpage metrics mandated by Federal law for agency and outside stakeholders to include Office of Management and Budget (OMB), Department of Justice (DOJ), and Congress.
- Degraded ability for analysis and remediation of accessibility defects for development and sustainment projects.
- Degraded subject matter experts' (SMEs) input to project development teams for remediation of non-compliant sites and projects.
- Loss of automated tools code checking software updates/maintenance for DevSecOps developers, specifically, Application Programing Interfaces (APIs), compliance verification browser Extensions, and automated scanning tool.

The following table shows four contracts that reference 508 and have ended after February 1, 2019.

PrimaryID	SecondaryID	Description
VA118- 11-D- 1008	VA118-1008-0099	The purpose of this TO is to conduct VA Department-wide Section 508 validation and conformance auditing of VA Electronic Information Technology products and systems.
VA118- 14-C- 0061		VA Section 508 Program Office requires HTML Compliance licensing and services.
VA118- 16-D- 1006	VA11816F10060001	The purpose of this requirement is to provide support services to overall project coordination, management of licenses, reporting, and Section 508 tool training and scripting which includes services to tailor and customize tools and products to meet the needs of the enterprise.
VA118- 16-D- 1020	VA11817F10200004	T4NG Section 508 TRM Testing.

The program office would be best suited to address whether any capacity was lost when these contracts ended.

Request 5: VA recently proposed regulations to improve its evaluation of information technology projects for Section 508 compliance, an issue that the VA's OIG identified as a problem for the Department in 2016. The proposed regulations specifically call for including a Section 508 checklist in VA solicitations and establishing a website to help contractors with Section 508 standards.

a. How does the VA currently evaluate contractors' ability to meet specific requirements for Section 508 accessibility and ensure that contractors are aware of those requirements?

<u>VA Response</u>: 508 requirements are included in contracts, so contractors should be aware of those requirements since they would be included in the Performance Work Statement. Noteworthy, for the present contracts, VA is working to put in place a combination of automated and manual scanning to evaluate 508 accessibilities.

See attachment 4, Acquisition Language for Section 508.

b. Does the VA have plans to further strengthen how it evaluates the ability of contractors to carry out work in compliance with Section 508?

VA Response: See Attachment 5, 508 Technical Criteria.

Request 6: Disability advocates have raised concern that VA is seeking waivers from Section 508 for some ongoing projects, including its new electronic health record system.

a. Please outline VA's process for determining the need for and approving a Section 508 waiver, including the circumstances under which a waiver can be requested, how these waivers are evaluated and which office or individual is responsible for approving a waiver. Are these processes uniform across VA, its components, contractors and subcontractors? If not, how do they differ, and what is the justification for those differences?

#### VA Response:

- 1. There are no provisions in the law for a waiver, however, exceptions may be granted.
- 2. Process and Approval:
  - (a) All Section 508 exceptions must meet the necessary requirements and adhere to the same review and approval/denial process.

- (b) Exceptions are granted by the VA agency Section 508 Office Chief/ VA 508 Program Manager.
- (c) Exceptions are only valid for the version or release indicated in the request.
- (d) The process for an Exception is uniform across all organizations and teams (inclusive of contractors/subcontractors) at VA.
- 3. Circumstances for an Exception
  - (a) The revised 508 standards include six general exceptions:
    - (1) Legacy information and communication technology (ICT.)
    - (2) National Security Systems.
    - (3) Federal Contracts.
    - (4) ICT Functions Located in Maintenance or Monitoring Spaces.
    - (5) Undue Burden or Fundamental Alteration.
    - (6) Best Meets.
  - (b) Alternative means must be documented in each Exception request.
- 4. No EHR exceptions have been requested through the VA Section 508 Office.

There are specific situations following where exceptions to Section 508 may be granted based on the Section 508 legal standards. Exceptions are granted only with approval from the agency Section 508 Office Chief/VA 508 Program Manager (or his/her designee) and are only valid for the version or release indicated in the request. GSA provides a list of 508 Program Managers for each government agency (GSA 508 Program Managers). Additional documentation may be requested by the 508 Office to determine if an exception is applicable. More information on Exceptions is available on the 508 Office website (Procedures 508 Exceptions).

508 Exceptions are processed via Service Now. There is a Service Now Catalog specifically for Section 508 exceptions (508 Accessibility Exception Request - VA ServicePortal v2).

When a 508 Exception is received in the 508 Intake assignment queue the following steps are followed:

- 508 Intake assignment monitor will update the Service Now Assignment Group ticket for the 508 Customer Service Assignment Group and update the "Assigned to Information" in the Service Now ticket to the project's assigned VA 508 full Time Employee (FTE) Subject Matter Expert (SME).
- 2. The 508 SME will review the exception request. The SME should:
  - a. Confirm that the Government Project Owner/Manager is noted in the request.
  - b. Confirm that the 508 Exception Type request is an authorized exception based on the Section 508 Law.

- c. Confirm the description of the product.
- d. Confirm the justification of the exception exist.
- e. Confirm that the alternative means is annotated.
- 508 SME upon confirmation of the data submitted shall update the Service Now Assignment Queue of the task to 508 Leadership and update the "Assigned to" field to the Chief of Section 508.
- 4. The ticket will then be reviewed by the Section 508 Office Chief/VA 508 Program Manager or his/her designee and the results returned to the VA 508 SME.
- 5. The VA 508 SME will contact the requester if the ticket is not approved and provide updates as needed.
- 6. If the Request is approved, the following actions will need to be accomplished by the 508 SME.
  - a. Create a Validation Statement.
    - (a) Store the Validation Statement on the Shared Drive, within the Section 508 FY Project Data Info folder under the appropriate year.
- b. Please provide a list of all waivers or other variances from the requirements of Section 508 of the Rehabilitation Act that VA, one of its components, contractors, or subcontractors, has sought or operated under since January 1, 2019. Please individually justify the rationale for all waivers the Department has sought.

<u>VA Response</u>: There are no provisions in the law for a waiver. The following table shows web-hosted applications; these are websites with approved exceptions.

Project Name	Exception Received	Justification
Document and Process Enabled Repositories (DAPER)	Fundament al Alteration	An exception is being requested regarding the use of the DAPER application to handle and present scanned and faxed ages of patient prescriptions to its users within Meds by Mail. The basis of the exception is 508 section E202.6 Fundamental Alteration. It is the fundamental nature of the system for a human to visually verify the information in the scanned image. Other specific project requirements call for the expansion in types of scanned and faxed images which only exacerbates the situation. There is not currently available any image to text conversion application which would work at a suitable level and the development team lacks the resources, requirements and business owner approval to conduct such work. The DAPER system currently

Project Name	Exception Received	Justification
		requires the transcription of all prescription information into VistA's Pharmacy package. Once entered into the Pharmacy package all information provided by these images is accessible.
Veterans Canteen Service (VCS) Zebra MC67 Handheld Scanner and Zebra Qln320 Portable Printer	Best Meets	In September 2016, VCS launched an information technology project to consolidate legacy handheld inventory scanners into one technologically modern scanner. The Scanner Replacement Project is using a "Technology Refresh" methodology (one for one handheld swap) to integrate newer hardware with VCS' legacy applications. This unique requirement significantly limited available marketplace solutions. Two legacy applications were ported from the legacy handheld for use on the new Zebra Technologies MC67 Scanner, VendMax and Wavelink Oracle client. Market research effort was constricted by the need for the new equipment and software to continue to support legacy applications. Certain handheld software is not compatible with newer operating systems (OS), which forced a decision to require the solution to utilize Windows Mobile Platform OS.
ICONICS GENESIS32 v9.5 X	Located in maintenanc e or monitoring spaces	ICONICS GENESIS32 is a mature and stable technology that may improve productivity for specific staff whose responsibilities include monitoring and tracking real-time power, electrical, water, and fuel monitoring for (SCADA) devices for local facility conditions. The vendor also provides a comprehensive set of documentation for this technology. Software is to monitor critical infrastructure of the facility within our "energy center" only. The intention is to use this software to monitor emergency power, fuel, waste for efficiency troubleshooting etc. by trained personnel at the site only of physical controls on systems such as backup generators, waste systems, water tower etc. Not intended for general use or by untrained personnel. Trained personnel include limited number of staff within

Exception Justification

Project Name

Establishment

2.3.2 Rev G

Computer Software

(VBECS), VBECS

1 Toject Hame	Received	dasincation
		Facilities Management Service at this facility and vendor support as needed. General access not permitted due to the classification of the system as critical. This will not be web-based software. The application will be housed on a VA virtualized server along with its data base. Not web accessible to the public, segregated accordance with Special Purpose Systems (SPS) guidelines and protected under Access Control List following VA guidelines for guidelines set for SPS systems.
Emergency Department Integration System (EDIS) v2.2	Undue Burden	The current version of EDIS is no longer compliant with the VA TRM or VA secure coding standards. As a result, code defects cannot be resolved, and application enhancements cannot be pursued until compliance is restored.  Additionally, the Flash browser plugin, a critical component of the application GUI, will be no longer be supported by Chrome or Internet Explorer after the end of calendar year 2020, resulting in the current version of EDIS ceasing to function at that time. Lastly, the current version of EDIS is located at physical data centers, AITC and PITC. This on-premises deployment is to be replaced with a VAEC implementation, using cloud service provider Microsoft Azure.
Parable Health	Fundament al Alteration	Parable Health is not able to be made accessible because visual acuity is required. Alternative means the data from this application will reside in CPRS and VISTA. The appropriate identification of wounds labeled correctly will be provided to VA employees.
Vista Blood	Best Meets	This software Is used exclusively by Veterans

Health Administration (VHA) Pathology and

laboratory Medicine Service (PLMS) employees

to prepare and support patient blood component

transfusions. Laboratory employees (Medical Technologists) must comply with vision and dexterity requirements in order to perform the day-to-day functions within the lab. VBECS will

		provide support by providing visual assistance when needed in order to meet E202.7.2 alternative means.
EPSI (Enterprise Precision Scanning and Indexing)	Fundament al Alteration	For EPSI Product, all users except the admin role will be having to look at the PDF scanned image and pull out the Veteran's name, date of birth, and consult date in order to search for the Veteran within the EPSI application and successfully attach this scanned document to the VistA record. The PDF-scanned images are not searchable and are not always computer typed. They often come across handwritten and are not in a standard format. Our project team is currently in the development phase with OIT funding and will make the product 508 compliant with that same funding as they are building out the MVP product and rolling it out nationally.
Invoice Payment Processing System	Fundament al Alteration	Invoice Payment Processing System (IPPS) is a business rules engine that relies heavily on data to make decisions. However, at the core a user is comparing one image vs another. Whether it's an invoice against a contract or an authorization to determine if the invoice is legally appropriate to pay. Because visual acuity is needed to compare what is in the database with the invoice being submitted by the Veteran, visual acuity is needed. Access to the information can be provided via remote visual tools (AIRA) or sighted assistance via a reader.

Request 7. Veterans service organizations have expressed concern that VA's patient check-in kiosks remain an issue for individuals with disabilities. Those kiosks are scheduled to be phased out, but we are concerned that veterans may face access issues in the meantime.

a. What is the current rollout schedule for VHA's mobile app? When does the VA currently expect to begin and complete its phase out of kiosks?

<u>VA Response</u>: The national deployment of the Patient Check-In (PCI) application began rollout in May 2022 by Veterans Integrated Service Networks (VISN) and is scheduled to end in September 2022. By September 2022 every VISN will be in the "Go Live" deployment phase, which indicates the PCI application is fully operational at facilities to be used by Veterans and staff.

b. How does VA provide accessible services in the meantime?

<u>VA Response</u>: Veterans requiring accessibility services may complete appointment check-in activities by seeing a staff member.

c. What kind of training is provided to VA staff to assist individuals with disabilities at VA medical centers?

<u>VA Response</u>: Currently, there is no <u>mandatory or required training for VA employees</u> to assist individuals with disabilities. There are, however, many optional training resources addressing care and support for those with disabilities (see attachment 6 to this enclosure).

d. How will VA ensure that the mobile application replacing the kiosks is accessible to people with disabilities, and ensure that veterans without access to mobile phones will have ready access to VA services?

<u>VA Response</u>: Accessibility within the Patient Check - In (PCI) application was part of the initial design and engineering work for any feature being built within the application. Instead of retrofitting the application with accessibility features as an afterthought, we have designed and built the application to be accessible as a foundational part of its architecture.

The PCI application is <u>WCAG 2.1</u> / Section 508 compliant, based on the <u>White House's accessibility standards</u>. Furthermore, WCAG 2.1 provides 17 additional success criteria to address:

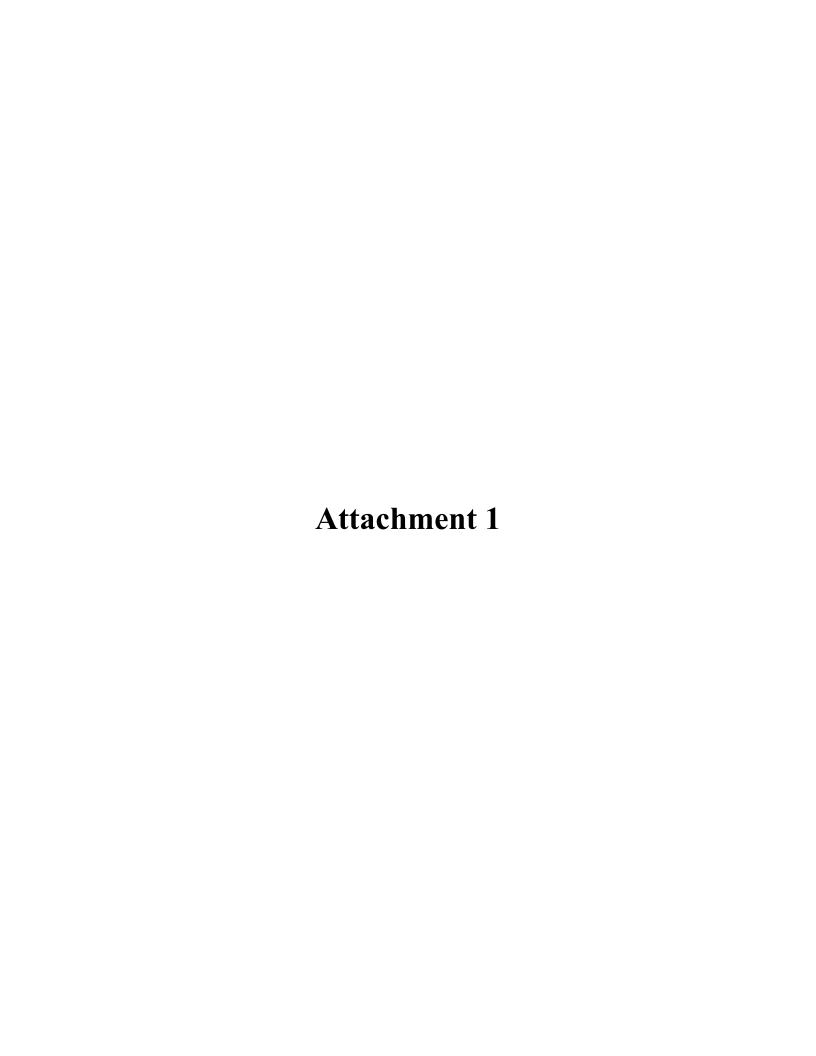
- Mobile accessibility.
- People with low vision.
- People with cognitive and learning disabilities.

In addition, WCAG 2.1 addresses cognitive considerations. These can include but are not limited to:

- Cognitive and learning disabilities.
- Significantly reduced ability in one or more areas of cognitive function, such as communication, reading, writing, or math, that affect learning.
- Significantly reduced ability to understand new or complex information and learn new skills, with a reduced ability to cope independently.
- Neurodiversity the different ways the brain can work and interpret information.
- Traumatic Brain Injury (TBI).
- Post-Traumatic Stress Disorder (PTSD).

The team building the application regularly tests the application with low vision and blind Veterans, including on-site visits at our pilot sites to ensure that the application works in context. For our design teams, this includes working with accessibility experts and disabled Veterans to ensure the visual design and functionality of the application work for those users. This user informed design is then implemented using automated accessibility tests as acceptance criteria.

Department of Veterans Affairs July 2022



### **Department of Veterans Affairs (VA)**

### **VA Web Accessibility**

# National Cemetery Administration Remediation Plan



June 23, 2022

- **1. PURPOSE:** The purpose of this document is to provide a web accessibility remediation plan for the National Cemetery Administration (NCA) Internet and Intranet to ensure compliance with Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d).
- **2. BACKGROUND:** The NCA Internet is currently 76% compliant, and the Intranet is 51% compliant based on WCAG 2.0 scans conducted by the Office of Information and Technology (OIT). NCA's mobile site is 100% compliant. The compliance issues are related to the following issues:
  - a. Approximately 950 PDF documents are non-compliant:
    - i. NCA Internet (108).
    - ii. NCA Intranet (847).
  - b. Three NCA web applications currently have 508 issues:
    - i. Veterans Legacy Memorial (in development).
    - ii. Daily Burial Schedule (at sustainment).
    - iii. Nationwide Gravesite Locator (at sustainment).
- **3. BARRIERS:** Resources, training and access to software present challenges for document remediation. At present, NCA employees are expected to perform document remediation activities as ancillary duties.

#### 4. PLAN / REMEDIATION ACTIVITIES:

- a. To remediate the backlog of non-compliant documents and to concurrently ensure that new documents posted to the NCA web domains are compliant, NCA has prepared a statement of work to award a document remediation contract in fiscal year (FY) 2023. NCA projects that it will take 3 years to remediate the backlog (FY 2023–2026). Documents will be prioritized according to most-frequently opened documents as indicated by analytics.
- b. Veterans Legacy Memorial (<u>www.va.gov/remember</u>) is a web application still in development. As part of the DevSecOps environment, the app is periodically scanned for 508 issues, which are remediated during the agile development lifecycle. VLM is expected to be at sustainment in FY 2026. Any minor issues discovered during sustainment will be remediated as they are identified.
- c. Daily Burial Schedule (<a href="www.cem.va.gov/dailyburialschedule">www.cem.va.gov/dailyburialschedule</a>) is a web application in sustainment which allows the public to search for the committal service date, time and cemetery for the scheduled burial of a Veteran, spouse or other eligible family member. The application is periodically scanned for 508 issues, which are remediated during the agile development lifecycle.
- d. Nationwide Gravesite Locator (https://gravelocator.cem.va.gov/ngl) is a

web application in sustainment that allows users to search for burial locations of Veterans and their family members in VA National Cemeteries, state Veterans' cemeteries, military, and Department of Interior cemeteries and for Veterans buried in private cemeteries when the grave is marked with a government grave marker. The application is periodically scanned for 508 issues which are remediated during the agile development lifecycle.

**5. NCA Points of Contact:** James LaPaglia (<u>james.lapaglia@va.gov</u>) and Lisa Hollenbeck (<u>lisa.hollenbeck2@va.gov</u>).



Attachment 1. List of internet website conformance levels

VA Site	URL	Conformance %
AIMS	https://www.veterantraining.va.gov/apps	
	/aims	100.000%
Clinical Epidemiology Research Center	https://www.cerc.research.va.gov	100.000%
Debt Management Center	https://www.va.gov/manage-va-debt/	100.000%
Each Day at VA	https://www.va.gov/eachday/	100.000%
Enhanced-Use Lease	https://www.va.gov/AssetManagement	100.000%
Financial Management Business		
Transformation Service (FMBTS)	https://www.va.gov/FMBTS	100.000%
	https://www.va.gov/disability/how-to-file-claim/evidence-needed/fully-	
Fully Developed Claims	developed-claims/	100.000%
Health Benefits Home	https://www.va.gov/healthbenefits	100.000%
ICARE	https://www.va.gov/ICARE	100.000%
Identity Theft Information for Veterans	https://www.va.gov/identitytheft	100.000%
Insomnia	https://www.veterantraining.va.gov/apps	100 0000/
Maying Forward	/insomnia	100.000%
Moving Forward	https://www.veterantraining.va.gov/apps/movingforward/	100.000%
Office of Accountability and Whistleblower	/movingrorward/	100.000%
Protection	https://www.va.gov/accountability	100.000%
Office of Acquisition, Logistics, and	intips.//www.va.gov/accountability	100.000%
Construction	https://www.va.gov/oalc	100.000%
Office of Asset Enterprise Management	https://www.va.gov/oaem	100.000%
peerreview	https://www.va.gov/peerreview	100.000%
Performance Based Interviewing	https://www.va.gov/PBI	100.000%
Terrormance based interviewing	https://www.va.gov/disability/how-to-	100.00070
	file-claim/when-to-file/pre-discharge-	
Pre-Discharge	claim/	100.000%
Quality, Privacy, and Risk (QPR) Process	https://www.va.gov/PROCESS	100.000%
same day services	https://www.va.gov/samedayservices	100.000%
SCSP - Secretary's Center for Strategic		200.00070
Partnership	https://www.va.gov/scsp	100.000%
	https://www.va.gov/securityinvestigation	
Security and Investigations Center	scenter	100.000%
Spinal Cord Injury & Disorders	https://www.sci.va.gov	100.000%
VA Debt Management Center	https://www.pay.va.gov	100.000%
VA Federal Supply Schedule	https://www.fss.va.gov	100.000%
VA Forms	https://www.va.gov/vaforms	100.000%
VA Jobs	https://www.va.gov/jobs	100.000%
VA Mobile Website	https://m.va.gov	100.000%
VA Office of Management	https://www.va.gov/OM	100.000%
VA Records Center and Vault	https://www.rcv.va.gov	100.000%
VA Store	https://www.va.gov/vastorenac	100.000%

VA Summer of Service	https://www.va.gov/vasummerofservice	100.000%
Veteran Care Coordination	https://www.lamp.visn8.med.va.gov	100.000%
VHA Office of the Medical Inspector	https://www.va.gov/health/medicalinspector/	100.000%
VA Pittsburgh Healthcare System	https://www.va.gov/pittsburgh-health- care	99.537%
Albany Stratton VA Medical Center	https://www.va.gov/albany-health-care	99.000%
Aleda E. Lutz VA Medical Center	https://www.va.gov/saginaw-health-care/	99.000%
Atlanta VA Medical Center	https://www.va.gov/atlanta-health-care/	99.000%
Bath VA Medical Center	https://www.fingerlakes.va.gov	99.000%
Bedford VA Medical Center, Massachusetts	https://www.va.gov/bedford-health-care	99.000%
Birmingham, Alabama VA Medical Center	https://www.va.gov/birmingham-health-care	99.000%
Central Alabama Veterans Health Care System	https://www.va.gov/central-alabama- health-care	99.000%
Central Arkansas Veterans Healthcare System	https://www.va.gov/central-arkansas- health-care	99.000%
Chalmers P. Wylie VA Ambulatory Care Center	https://www.va.gov/central-ohio-health- care	99.000%
Charles George VA Medical Center	https://www.va.gov/asheville-health- care	99.000%
Charlie Norwood VA Medical Center	https://www.va.gov/augusta-health-care	99.000%
Chillicothe VA Medical Center	https://www.va.gov/chillicothe-health- care	99.000%
Cincinnati VA Medical Center	https://www.va.gov/cincinnati-health- care	99.000%
Coatesville VA Medical Center	https://www.va.gov/coatesville-health-care/	99.000%
Dayton VA Medical Center, Ohio	https://www.va.gov/dayton-health-care	99.000%
Durham VA Medical Center	https://www.va.gov/durham-health- care/	99.000%
Edward Hines, Jr. VA Hospital	https://www.va.gov/hines-health-care	99.000%
Erie VA Medical Center	https://www.va.gov/erie-health-care/	99.000%
Fayetteville VA Medical Center	https://www.va.gov/fayetteville-coastal- health-care	99.000%
Grand Junction VA Medical Center	https://www.va.gov/western-colorado- health-care	99.000%
Harry S. Truman Memorial Veterans' Hospital	https://www.va.gov/columbia-missouri- health-care	99.000%
Houston VA Health Services Research &	https://www.houston.hsrd.research.va.g	35.55575
Development Center of Excellence	ov	99.000%
Hunter Holmes McGuire VA Medical Center	https://www.va.gov/richmond-health- care	99.000%
Jack C. Montgomery VA Medical Center	https://www.va.gov/eastern-oklahoma- health-care/	99.000%
James A. Haley Veterans' Hospital	https://www.va.gov/tampa-health-care	99.000%
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John D. Dingell VA Medical Center, Detroit, Michigan	https://www.va.gov/detroit-health-care/	99.000%
Kansas City VA Medical Center	https://www.va.gov/kansas-city-health-care	99.000%
Lebanon VA Medical Center	https://www.va.gov/lebanon-health- care/	99.000%
Louis Stokes Cleveland VA Medical Center	https://www.va.gov/northeast-ohio- health-care	99.000%
Louisville VA Medical Center	https://www.va.gov/louisville-health- care	99.000%
Martinsburg VA Medical Center	https://www.va.gov/martinsburg-health-care	99.000%
Memphis VA Medical Center	https://www.va.gov/memphis-health- care	99.000%
Michael E. DeBakey VA Medical Center	https://www.va.gov/houston-health-care	99.000%
Milwaukee VA Medical Center	https://www.va.gov/milwaukee-health- care/	99.000%
Minneapolis VA Health Care System	https://www.va.gov/minneapolis-health-care/	99.000%
Mountain Home VA Medical Center	https://www.va.gov/mountain-home- health-care	99.000%
North Florida/South Georgia Veterans Health System	https://www.va.gov/north-florida-health-care	99.000%
Oklahoma City VA Medical Center	https://www.va.gov/oklahoma-city- health-care/	99.000%
Portland VA Medical Center	https://www.va.gov/portland-health- care/	99.000%
Providence VA Medical Center	https://www.va.gov/providence-health-care/	99.000%
Ralph H. Johnson VA Medical Center	https://www.va.gov/charleston-health- care/	99.000%
Richard L. Roudebush VA Medical Center	https://www.va.gov/indiana-health-care	99.000%
San Francisco VA Medical Center	https://www.va.gov/san-francisco- health-care	99.000%
South Texas Veterans Health Care System	https://www.va.gov/south-texas-health- care	99.000%
Spokane VA Medical Center	https://www.va.gov/spokane-health- care/	99.000%
St. Cloud VA Health Care System	https://www.va.gov/st-cloud-health- care/	99.000%
Syracuse VA Medical Center	https://www.va.gov/syracuse-health- care/	99.000%
Tennessee Valley Healthcare System	https://www.va.gov/tennessee-valley- health-care	99.000%
VA Ann Arbor Healthcare System	https://www.va.gov/ann-arbor-health- care	99.000%
VA Boston Healthcare System	https://www.va.gov/boston-health-care	99.000%
•	<u>, ,                                  </u>	1

VA Butler Healthcare	https://www.va.gov/butler.boolth.care/	99.000%
	https://www.va.gov/butler-health-care/	33.000%
VA Central Iowa Health Care System	https://www.va.gov/central-iowa-health- care	99.000%
VA Connecticut Healthcare System	https://www.va.gov/connecticut-health- care	99.000%
VA Eastern Colorado Health Care System	https://www.va.gov/eastern-colorado- health-care	99.000%
VA Finger Lakes Healthcare System	https://www.va.gov/finger-lakes-health- care	99.000%
VA Greater Los Angeles Healthcare System	https://www.va.gov/greater-los-angeles- health-care	99.000%
VA Gulf Coast Veterans Health Care System	https://www.va.gov/gulf-coast-health- care	99.000%
VA Illiana Health Care System, Danville, Illinois	https://www.va.gov/illiana-health-care	99.000%
VA Long Beach Healthcare System	https://www.va.gov/long-beach-health- care	99.000%
VA Maryland Health Care System	https://www.va.gov/maryland-health- care	99.000%
VA Montana Health Care System	https://www.va.gov/montana-health- care	99.000%
VA Nebraska-Western Iowa Health Care System	https://www.va.gov/nebraska-western- iowa-health-care/	99.000%
VA New Jersey Health Care System	https://www.va.gov/new-jersey-health- care/	99.000%
VA North Texas Health Care System	https://www.va.gov/north-texas-health- care	99.000%
VA Northern California Health Care System	https://www.va.gov/northern-california- health-care/	99.000%
VA Northern Indiana Health Care System	https://www.va.gov/northern-indiana- health-care/	99.000%
VA Pacific Islands Health Care System	https://www.va.gov/pacific-islands- health-care	99.000%
VA Palo Alto Health Care System	https://www.va.gov/palo-alto-health- care	99.000%
VA Puget Sound Health Care System	https://www.va.gov/puget-sound-health- care	99.000%
VA Salt Lake City Health Care System	https://www.va.gov/salt-lake-city-health-care/	99.000%
VA San Diego Healthcare System	https://www.va.gov/san-diego-health- care/	99.000%
VA Sierra Nevada Health Care System	https://www.va.gov/sierra-nevada- health-care	99.000%
VA Southern Nevada Healthcare System	https://www.va.gov/southern-nevada- health-care	99.000%
Veterans Health Care System of the Ozarks	https://www.va.gov/fayetteville- arkansas-health-care/	99.000%

W. G. (Bill) Hefner VA Medical Center	https://www.va.gov/salisbury-health-	00.000%
Washington DC VA Madical Contan	care	99.000%
Washington DC VA Medical Center	https://www.va.gov/washington-dc- health-care	99.000%
William S. Middleton Memorial Veterans Hospital	https://www.va.gov/madison-health-care	99.000%
Wilmington VA Medical Center	https://www.va.gov/wilmington-health-	
Mary John in the David NAMC	care/	99.000%
Wm. Jennings Bryan Dorn VAMC	https://www.va.gov/columbia-south-carolina-health-care	99.000%
Alaska VA Healthcare System	https://www.va.gov/alaska-health-care/	98.000%
Alexandria VA Health Care System	https://www.va.gov/alexandria-health- care	98.000%
Amarillo VA Health Care System	https://www.va.gov/amarillo-health-care	98.000%
Battle Creek VA Medical Center	https://www.va.gov/battle-creek-health-	
B. Birry VA Hardtham Cartain	care/	98.000%
Bay Pines VA Healthcare System	https://www.va.gov/bay-pines-health- care	98.000%
Beckley VA Medical Center	https://www.va.gov/beckley-health-care	98.000%
Boise VA Medical Center	https://www.va.gov/boise-health-care	98.000%
Carl Vinson VA Medical Center Dublin, Georgia	https://www.va.gov/dublin-health-care/	98.000%
Central Texas Veterans Health Care System	https://www.va.gov/central-texas- health-care	98.000%
Cheyenne VA Medical Center	https://www.va.gov/cheyenne-health-	
TI Dana MA Haalib Cana Contain	care/	98.000%
El Paso VA Health Care System	https://www.va.gov/el-paso-health-care	98.000%
Fargo VA Health Care System	https://www.va.gov/fargo-health-care	98.000%
G.V. (Sonny) Montgomery VA Medical Center	https://www.va.gov/jackson-health-care/	98.000%
Hampton VA Medical Center	https://www.va.gov/hampton-health- care	98.000%
Huntington VA Medical Center	https://www.va.gov/huntington-health- care	98.000%
ideas research - Informatics, Decision-	https://www.ideas.research.va.gov	
Enhancement, and Analytical Sciences Iowa City VA Health Care System	https://www.va.gov/iowa-city-health-	98.000%
	care/	98.000%
James E. Van Zandt VA Medical Center	https://www.va.gov/altoona-health-care/	98.000%
James J. Peters VA Medical Center	https://www.va.gov/bronx-health-care/	98.000%
Jesse Brown VA Medical Center	https://www.va.gov/bronx-health-care/	98.000%
John J Pershing VA Medical Center	https://www.va.gov/poplar-bluff-health-care/	98.000%
Jonathan M. Wainwright Memorial VA Medical Center	https://www.va.gov/walla-walla-health- care/	98.000%
Lexington VA Medical Center	https://www.va.gov/lexington-health-	
<b>5</b>	care	98.000%

Louis A. Johnson VA Medical Center	https://www.va.gov/clarksburg-health-	
	care	98.000%
Manchester VA Medical Center	https://www.va.gov/manchester-health-	
	care	98.000%
Marion VA Medical Center	https://www.va.gov/marion-health-care	98.000%
Miami VA Healthcare System	https://www.va.gov/miami-health-care/	98.000%
Northern Arizona VA Health Care System	https://www.va.gov/northern-arizona-	
	health-care	98.000%
Northport VA Medical Center	https://www.va.gov/northport-health-	
	care	98.000%
Orlando VA Medical Center	https://www.va.gov/orlando-health-care	98.000%
Oscar G. Johnson VA Medical Center	https://www.va.gov/iron-mountain-	
	health-care/	98.000%
Overton Brooks VA Medical Center	https://www.va.gov/shreveport-health-	
	care	98.000%
Philadelphia VA Medical Center	https://www.va.gov/philadelphia-health-	
	care	98.000%
Phoenix VA Health Care System	https://www.va.gov/phoenix-health-care	98.000%
Robert J. Dole VA Medical Center Wichita	https://www.va.gov/wichita-health-care	98.000%
Salem VA Medical Center	https://www.va.gov/salem-health-care	98.000%
Sheridan VA Medical Center	https://www.va.gov/sheridan-health-	
	care	98.000%
Sioux Falls VA Health Care System	https://www.va.gov/sioux-falls-health-	
	care	98.000%
Southeast Louisiana Veterans Health Care	https://www.va.gov/southeast-louisiana-	
System	health-care	98.000%
Southern Arizona VA Health Care System	https://www.va.gov/southern-arizona-	
	health-care	98.000%
Southern Oregon Rehabilitation Center &	https://www.va.gov/southern-oregon-	
Clinics	health-care	98.000%
Tomah VA Medical Center	https://www.va.gov/tomah-health-care	98.000%
Tuscaloosa VA Medical Center	https://www.va.gov/tuscaloosa-health-	
	care/	98.000%
VA Black Hills Health Care System	https://www.va.gov/black-hills-health-	
	care	98.000%
VA Caribbean Healthcare System	https://www.va.gov/caribbean-health-	
	care	98.000%
VA Central California Health Care System	https://www.va.gov/central-california-	
	health-care	98.000%
VA Central Western Massachusetts	https://www.va.gov/central-western-	00.0000
Healthcare System	massachusetts-health-care/	98.000%
VA Health Care Upstate New York	https://www.visn2.va.gov	98.000%
VA Hudson Valley Health Care System	https://www.va.gov/hudson-valley-	00.00004
WA Leave I'm lealing Control	health-care	98.000%
VA Loma Linda Healthcare System	https://www.va.gov/loma-linda-health-	00.0000/
NA NACLA HARIBANA CAR	care/	98.000%
VA Maine Healthcare System	https://www.va.gov/maine-health-care/	98.000%

VA NY Harbor Healthcare System	https://www.va.gov/new-york-harbor-	
	health-care	98.000%
VA Rocky Mountain Network	https://www.visn19.va.gov	98.000%
VA Roseburg Healthcare System	https://www.va.gov/roseburg-health-	
	care/	98.000%
VA St. Louis Health Care System	https://www.va.gov/st-louis-health-care	98.000%
VA Texas Valley Coastal Bend Health Care	https://www.va.gov/texas-valley-health-	
System	care	98.000%
VA Western New York Healthcare System	https://www.va.gov/western-new-york-	
	health-care	98.000%
VHA Documents Home Page	https://www.va.gov/vhapublications	98.000%
West Palm Beach VA Medical Center	https://www.va.gov/west-palm-beach-	
	health-care	98.000%
West Texas VA Health Care System	https://www.va.gov/west-texas-health-	
	care	98.000%
White River Junction VA Medical Center	https://www.whiteriver.va.gov	98.000%
Wilkes-Barre VA Medical Center	https://www.va.gov/wilkes-barre-health-	
	care/	98.000%
Center for Limb Loss and MoBility (CLiMB)	https://www.climb.va.gov	97.000%
Choose VA	https://www.choose.va.gov	97.000%
New Mexico VA Health Care System	https://www.va.gov/new-mexico-health-	
,	care	97.000%
South Central VA Health Care Network	https://www.visn16.va.gov	97.000%
Center for Healthcare Organization and	https://www.choir.research.va.gov	
Implementation Research		96.000%
Center for Management of Complex	https://www.cmc3.research.va.gov	
Chronic Care		96.000%
Employee Education System	https://www.va.gov/EMPLOYEEEDUCATI	
	ON	96.000%
Hepatitis C	https://www.hepatitis.va.gov	96.000%
Office of Small and Disadvantaged Business		
Utilization	https://www.va.gov/osdbu	96.000%
V.A. Section 508	https://www.section508.va.gov	96.000%
VA Authentication Federation		
Infrastructure	https://www.va.gov/eauth	96.000%
VA Heart of Texas Health Care Network	https://www.heartoftexas.va.gov	96.000%
VA MidSouth Healthcare Network	https://www.visn9.va.gov	96.000%
Brain Rehabilitation Research Center	https://www.brrc.research.va.gov	95.000%
Minneapolis VA Health Care System	http://www.va.gov/MINNEAPOLISRESEA	
Research Service -	RCH	
MINNEAPOLISRESEARCH		95.000%
Nutrition and Food Services	https://www.nutrition.va.gov	95.000%
VA Acquisition Academy	https://www.acquisitionacademy.va.gov	95.000%
VA Travel Nurse Corps	https://www.va.gov/nursing/	95.000%
Veterans Experience Office (VEO)	https://www.va.gov/VE	95.000%
Office of Nursing Services	https://www.va.gov/nursing	94.000%

The Simulation Learning, Education and	https://www.simlearn.va.gov	
Research Network	inteps,//www.simmedimedia.gov	94.000%
VA Desert Pacific Healthcare Network	https://www.desertpacific.va.gov	94.000%
VHA Office of Community Care	https://www.va.gov/communitycare/	94.000%
VHA Office of Emergency Management	https://www.va.gov/vhaemergencymana	
3 , 3	gement	94.000%
VA Great Lakes Health Care System	https://www.visn12.va.gov	93.000%
VA New England Healthcare System	https://www.newengland.va.gov	93.000%
HSR&D Center for Health Information and	https://www.chic.research.va.gov	
Communication (CHIC)		92.000%
MOVE! Weight Management Program	https://www.move.va.gov	92.000%
Office of Acquisition and Logistics	https://www.va.gov/oal	92.000%
Office of Privacy and Records Management	https://www.oprm.va.gov	92.000%
Public Health	https://www.publichealth.va.gov	92.000%
Quality of Care	https://www.va.gov/qualityofcare/	92.000%
VA Sierra Pacific Network	https://www.visn21.va.gov	92.000%
Veteran Employment Toolkit	https://www.va.gov/vetsinworkplace/	92.000%
Returning Service Members (OEF/OIF)	https://www.va.gov/post911veterans/	91.000%
VA Capitol Health Care Network - VISN 5	https://www.va.gov/visn5	91.000%
VA Center of Excellence for Limb Loss	https://www.amputation.research.va.gov	
Prevention and Prosthetic Engineering		91.000%
VA Cooperative Studies Program (CSP)	https://www.vacsp.research.va.gov	91.000%
Captain James A. Lovell Federal Health Care	https://www.lovell.fhcc.va.gov	
Center		90.000%
Chronic Pain Management	https://www.va.gov/ChronicPainMgmt/C	
	hronicPainEducationforVeterans/	90.000%
VA Northwest Health Network	https://www.visn20.med.va.gov	90.000%
VHA Diagnostic Electron Microscopy	https://www.va.gov/diagnosticem	
Program		90.000%
Office of Procurement, Acquisition and		
Logistics	https://www.va.gov/OPAL	89.000%
Reach	http://www.va.gov/REACH	89.000%
Office of Information Technology	https://www.oit.va.gov	88.000%
Pension	https://www.benefits.va.gov/pension/	88.000%
The Financial Services Center	https://www.fsc.va.gov	88.000%
VA Voluntary Service	https://www.volunteer.va.gov	88.000%
Ann Arbor VA Research	https://www.annarbor.research.va.gov	87.000%
Assistant Secretary for Human Resources		
and Administration	https://www.va.gov/ofcadmin	87.000%
Office of Operations, Security, and		
Preparedness	https://www.osp.va.gov	87.000%
Center for the Prevention and Treatment of Visual Loss	https://www.vision.research.va.gov	86.000%
Human Capital Services Center - hcsc	https://www.hcsc.va.gov	86.000%
VA Learning University	https://www.hcsc.va.gov/	86.000%
Office of Inspector General	https://www.va.gov/oig	85.000%
Office of hispector defletal	TILLPS.//www.va.gov/OIg	63.000%

VA Healthcare - VISN 4	https://www.visn4.va.gov	85.000%
Center for Comprehensive Access &	https://www.cadre.research.va.gov	
Delivery Research and Evaluation		84.000%
EHRM - Electronic Health Record		
Modernization	https://www.ehrm.va.gov	84.000%
Office of Research Oversight	https://www.va.gov/oro	84.000%
VA Healthcare System of Ohio	https://www.visn10.va.gov	84.000%
VA Southeast Network - VISN 7	https://www.southeast.va.gov	84.000%
VA/DoD Clinical Practice Guidelines	https://www.healthquality.va.gov	84.000%
Office of Congressional and Legislative	, , ,	
Affairs	https://www.va.gov/oca	83.000%
VAntage Points	https://www.blogs.va.gov/VAntage	83.000%
VHA National Center for Health Promotion	https://www.prevention.va.gov	
& Disease Prevention		83.000%
Energy Management Program Service		
(EMPS)	https://www.energy.va.gov	82.000%
VA Sunshine Healthcare Network	https://www.visn8.va.gov	82.000%
Veteran Parenting	https://www.veterantraining.va.gov/apps	
9	/veteranparenting/	82.000%
Advanced Platform Technology Center	https://www.aptcenter.research.va.gov	81.000%
Auditory Vestibular Research Enhancement	https://www.avreap.research.va.gov	
Award Program		81.000%
Health Care	https://www.va.gov/health	81.000%
Office of VA/DoD Health Affairs	https://www.va.gov/VADODHEALTH	81.000%
VA Digital Strategy	https://www.va.gov/digitalstrategy	81.000%
VA Midwest Health Care Network	https://www.visn23.va.gov	81.000%
Center for Chronic Disease Outcomes	https://www.ccdor.research.va.gov	
Research - CCDOR		80.000%
Multiple Sclerosis Center of Excellence	https://www.va.gov/ms	80.000%
The Center for Information Dissemination	https://www.cider.research.va.gov	
and Education Resources		80.000%
VA ONCE	https://vaonce.vba.va.gov	80.000%
Center for the Study of Healthcare	https://www.cshiip.research.va.gov	
Innovation, Implementation and Policy		79.000%
Geriatrics and Extended Care	https://www.va.gov/GERIATRICS	79.000%
VA Heartland Network	https://www.visn15.va.gov	78.000%
VA National Standards of Practice	http://www.va.gov/STANDARDSOFPRACT	
	ICE	78.000%
VHA Optometry Service	https://www.va.gov/OPTOMETRY	78.000%
	https://www.va.gov/CENTERFORMINORI	
Center for Minority Veterans	TYVETERANS	77.000%
Geriatric Research Education and Clinical	https://www.va.gov/grecc	
Centers		77.000%
Office of the Assistant Deputy Under	https://www.va.gov/VHAStrategy/	
Secretary for Health for Policy and Planning		77.000%
VA Web Governance	https://www.va.gov/web	77.000%

VHA Procurement & Logistics Office	https://www.va.gov/plo	77.000%
National Cemetery Administration	https://www.cem.va.gov	76.000%
National Center for Ethics in Health Care	https://www.ethics.va.gov	76.000%
Office of Enterprise Integration (OEI)	https://www.va.gov/oei	75.000%
VA Center of Excellence in Functional	https://www.fes.research.va.gov	
Electrical Stimulation	little of the second of the se	75.000%
Center for Innovation to Implementation	https://www.ci2i.research.va.gov	74.000%
Office of Survivors Assistance	https://www.va.gov/survivors	74.000%
Psychology Training	https://www.psychologytraining.va.gov	74.000%
VA Eastern Kansas Health Care System	https://www.va.gov/eastern-kansas-	
•	heatIth-care/	74.000%
VA National Center for Patient Safety	https://www.patientsafety.va.gov	74.000%
VA Publications	https://www.va.gov/vapubs	74.000%
VHA Pain Management	https://www.va.gov/painmanagement	74.000%
Patient Care Services	https://www.patientcare.va.gov	73.000%
VA Polytrauma System of Care	https://www.polytrauma.va.gov	73.000%
Center for Women Veterans Home	https://www.va.gov/womenvet	72.000%
Center of Innovation on Disability and	https://www.cindrr.research.va.gov	
Rehabilitation Research		72.000%
Rehabilitation Outcomes Research Center	https://www.rorc.research.va.gov	72.000%
Office of Occupational Safety and Health	https://www.va.gov/vasafety	71.000%
VA Caregiver Support	https://www.caregiver.va.gov	71.000%
Dietetic Internship Program	https://www.dieteticinternship.va.gov	70.000%
Mental Health	https://www.mentalhealth.va.gov	70.000%
VA Homepage	https://www.va.gov	70.000%
VA Social Work	https://www.socialwork.va.gov	70.000%
WEAMS Inquiry	https://inquiry.vba.va.gov	70.000%
Home Loans	https://www.benefits.va.gov/homeloans/	69.000%
VHA Office of Telehealth Services	https://www.telehealth.va.gov	69.000%
Homeless Veterans	https://www.va.gov/homeless	68.000%
Research and Development - VA Iowa City	https://www.research.iowa-	
Health Care System	city.med.va.gov	68.000%
About VA	https://www.va.gov/about_va	67.000%
Seattle-Denver Center of Innovation (COIN)	https://www.seattledenvercoin.research.	
	va.gov	67.000%
War Related Illness and Injury Study Center	https://www.warrelatedillness.va.gov	67.000%
Office of Public and Intergovernmental		
Affairs	https://www.va.gov/opa	66.000%
VA Library	https://www.va.gov/library	66.000%
Office of Construction & Facilities		
Management	https://www.cfm.va.gov	65.000%
Research Advisory Committee on Gulf War	https://www.va.gov/rac-gwvi	
Veterans' Illnesses		65.000%
RSS Library	https://www.va.gov/rss	65.000%
Office of Regulation Policy and		
Management	https://www.va.gov/orpm	64.000%

VHA National Center for Organization	https://www.va.gov/NCOD	
Development	Tittps://www.va.gov/NCOD	64.000%
Women Veterans Health Care	https://www.womenshealth.va.gov	64.000%
Office of Tribal Government Relations	https://www.va.gov/tribalgovernment	63.000%
Veterans Re-Entry Search Services	https://vrss.va.gov	63.000%
Durham Center for Health Services	https://www.durham.hsrd.research.va.go	03.00076
Research in Primary Care	v	62.000%
Pharmacy Benefits Management Services	https://www.pbm.va.gov	62.000%
Vet Center		
	https://www.vetcenter.va.gov	62.000%
Activities - MIRECC/CoE Educational	https://www.mirecc.va.gov/apps/activiti	60.0000/
Products	es	60.000%
Epilepsy	https://www.epilepsy.va.gov	60.000%
Facility and Leadership (Directory)	https://www.va.gov/directory	60.000%
Mental Illness Research, Education and	https://www.mirecc.va.gov	
Clinical Centers		60.000%
	https://www.dementia.cindrr.research.v	
Dementia Caregiver Support	a.gov	58.000%
Portland COIN	https://www.portlandcoin.research.va.go	
	V	58.000%
VA Center for Innovation	https://www.innovation.va.gov	58.000%
VA Innovation Center (VIC)	https://www.innovation.va.gov	58.000%
Prosthetic and Sensory Aids Service	https://www.prosthetics.va.gov	57.000%
Social and Community Rehabilitation	https://www.socrr.research.va.gov	
Research (SoCRR)		57.000%
Life Insurance	https://www.benefits.va.gov/insurance/	56.000%
Partnered Evidence-Based Policy Resource	https://www.peprec.research.va.gov	
Center		55.000%
Patient Centered Care	https://www.va.gov/patientcenteredcare	
	/	55.000%
Rehab and Prosthetics (secondary binding)	https://www.rehab.va.gov	55.000%
RESCUE - Resources and Education for	https://www.stroke.cindrr.research.va.go	
Stroke Caregivers Understanding and	v	
Empowerment		55.000%
Seattle Epidemiologic Research and	https://www.seattle.eric.research.va.gov	
Information Center	, , , , , , , , , , , , , , , , , , , ,	54.000%
VA For Veterans	https://www.vaforvets.va.gov	53.000%
	https://www.benefits.va.gov/vbatemplat	23.000/0
VBA Template	e/	53.000%
VHA Office of Health Equity	https://www.va.gov/healthequity	53.000%
Parkinson's Disease Research, Education,	https://www.parkinsons.va.gov	33.000/0
and Clinical Centers	inceps.//www.parkinsons.va.gov	52.000%
and Chinear Centers	https://www.benefits.va.gov/robaltimore	32.00070
Pagional Office Paltimore	/ / / / / / / / / / / / / / / / / / /	52.000%
Regional Office Baltimore	https://www.honofite.vo.gov/buffele/	52.000%
Regional Office Buffalo	https://www.benefits.va.gov/buffalo/	52.000%
Regional Office Cheyenne	https://www.benefits.va.gov/cheyenne/	52.000%
Regional Office Cleveland	https://www.benefits.va.gov/cleveland/	52.000%
Regional Office Denver	https://www.benefits.va.gov/denver/	52.000%

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Regional Office Honolulu	https://www.benefits.va.gov/honolulu/	52.000%
Regional Office Houston	https://www.benefits.va.gov/houston/	52.000%
Regional Office Manila	https://www.benefits.va.gov/manila/	52.000%
	https://www.benefits.va.gov/philadelphi	
Regional Office Philadelphia	a/	52.000%
Regional Office Reno	https://www.benefits.va.gov/reno/	52.000%
Regional Office San Diego	https://www.benefits.va.gov/sandiego/	52.000%
Regional Office St Louis	https://www.benefits.va.gov/stlouis/	52.000%
Regional Office Togus	https://www.benefits.va.gov/togus/	52.000%
VA Center for Clinical Management	https://www.annarbor.hsrd.research.va.g	
Research	ov	52.000%
VA Claims Transformation Plan	https://www.va.gov/performance/	52.000%
	https://www.benefits.va.gov/albuquerqu	
Regional Office Albuquerque	е	51.000%
Regional Office Anchorage	https://www.benefits.va.gov/anchorage/	51.000%
Regional Office Boise	https://www.benefits.va.gov/boise/	51.000%
Regional Office Boston	https://www.benefits.va.gov/boston/	51.000%
Regional Office Chicago	https://www.benefits.va.gov/chicago/	51.000%
Regional Office Columbia	https://www.benefits.va.gov/columbia/	51.000%
Regional Office Detroit	https://www.benefits.va.gov/detroit/	51.000%
Regional Office Fargo	https://www.benefits.va.gov/fargo/	51.000%
	https://www.benefits.va.gov/fortharrison	
Regional Office Fort Harrison	/	51.000%
Regional Office Hartford	https://www.benefits.va.gov/hartford/	51.000%
Regional Office Huntington	https://benefits.va.gov/huntington/	51.000%
Regional Office Jackson	https://www.benefits.va.gov/jackson/	51.000%
Regional Office Lincoln	https://www.benefits.va.gov/lincoln/	51.000%
Regional Office Little Rock	https://www.benefits.va.gov/littlerock/	51.000%
Regional Office Los Angeles	https://www.benefits.va.gov/losangeles/	51.000%
Regional Office Louisville	https://www.benefits.va.gov/louisville/	51.000%
Negional office Louisvine	https://www.benefits.va.gov/manchester	31.00070
Regional Office Manchester	/	51.000%
Regional Office Milwaukee	https://www.benefits.va.gov/milwaukee/	51.000%
Regional Office Muskogee	https://www.benefits.va.gov/muskogee/	51.000%
Regional Office Nashville	https://www.benefits.va.gov/maskogce/	51.000%
Regional Office New York	https://www.benefits.va.gov/nashville/	51.000%
Regional Office Newark	https://www.benefits.va.gov/newyork/	51.000%
Regional Office Newark	https://www.benefits.va.gov/newark/	51.000%
Regional Office Phoenix	https://www.benefits.va.gov/oakiand/	51.000%
	https://www.benefits.va.gov/phoenix/	51.000%
Regional Office Pittsburgh Regional Office Portland		
regional Office Portiand	https://www.benefits.va.gov/providence	51.000%
Pagional Office Providence	https://www.benefits.va.gov/providence	E1 000%
Regional Office Providence	https://www.honofits.va.gov/roons/s/	51.000%
Regional Office Roanoke	https://www.benefits.va.gov/roanoke/	51.000%
Pagional Office Salt Lake City	https://www.benefits.va.gov/saltlakecity	E1 0000/
Regional Office Salt Lake City	1	51.000%

Regional Office San Juan	https://www.benefits.va.gov/sanjuan/	51.000%
Regional Office Seattle	https://www.benefits.va.gov/seattle/	51.000%
Regional Office Sioux Falls	https://www.benefits.va.gov/siouxfalls/	51.000%
Regional Office St Paul	https://www.benefits.va.gov/stpaul/	51.000%
Regional Office Waco	https://www.benefits.va.gov/waco/	51.000%
	https://www.benefits.va.gov/washington	
Regional Office Washington	/	51.000%
	https://www.benefits.va.gov/whiteriverj	
Regional Office White River Junction	unction/	51.000%
Regional Office Wichita	https://www.benefits.va.gov/wichita/	51.000%
	https://www.benefits.va.gov/wilmington	
Regional Office Wilmington	/	51.000%
	https://www.benefits.va.gov/winstonsale	
Regional Office Winston-Salem	m	51.000%
Directory of Veterans Service Organizations	https://www.va.gov/vso/	50.000%
ORMDI - Office of Resolution		
Management, Diversity & Inclusion	https://www.va.gov/ORMDI	50.000%
PREVENTS - The President's Roadmap to	https://www.va.gov/PREVENTS	
Empower Veterans and End a National		
Tragedy of Suicide (PREVENTS)		50.000%
Regional Office Atlanta	https://www.benefits.va.gov/atlanta/	50.000%
Regional Office Des Moines	https://www.benefits.va.gov/desmoines/	50.000%
	https://www.benefits.va.gov/indianapoli	
Regional Office Indianapolis	s/	50.000%
	https://www.benefits.va.gov/neworleans	
Regional Office New Orleans	/	50.000%
	https://www.benefits.va.gov/stpetersbur	
Regional Office St Petersburg	g/	50.000%
Transition Assistance Program	https://www.benefits.va.gov/TAP/	50.000%
VBA Education and Training (GI Bill)	https://www.benefits.va.gov/gibill/	50.000%
Veterans Benefits Administration	https://www.benefits.va.gov	50.000%
	https://benefits.va.gov/benefits/vonapp.	
Veterans On-Line Application	asp	50.000%
Vocational Rehabilitation	https://www.benefits.va.gov/vocrehab/	50.000%
Center for Health Equity Research and	https://www.cherp.research.va.gov	
Promotion		49.000%
Quality Enhancement Research Initiative	https://www.queri.research.va.gov	49.000%
National Oncology Program Office	https://www.cancer.va.gov	47.000%
Office of Human Resources	https://www.va.gov/employee/	47.000%
VA Information Resource Center	https://www.virec.research.va.gov	47.000%
Web Automated Reference Material		
System	https://www.benefits.va.gov/warms/	46.000%
Office of Budget	https://www.va.gov/budget	45.000%
VA Canteen Service	https://www.vacanteen.va.gov	45.000%
Alternative Dispute Resolution	https://www.va.gov/adr	44.000%
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National Center for Rehabilitative Auditory	https://www.ncrar.research.va.gov	
Research	metps.//www.nerar.nesearen.va.gov	44.000%
VA Software Document Library	https://www.va.gov/vdl	44.000%
VistA Monograph	https://www.va.gov/vdl/	44.000%
10011101100010001	https://www.va.gov/anywheretoanywher	11100070
anywheretoanywhere	e	43.000%
VHA Office of Rural Health	https://www.ruralhealth.va.gov	43.000%
Fiduciary	https://www.benefits.va.gov/fiduciary/	41.000%
VA Mid-Atlantic Health Care Network	https://www.visn6.va.gov	41.000%
Benefits A-Z	https://www.benefits.va.gov/AtoZ	40.000%
Blue Button	https://www.va.gov/bluebutton	40.000%
Military to Civilian	https://www.visn23.va.gov/apps/Military	10.00070
William y to civilian	2Civilian	40.000%
Montgomery Redional Office	https://benefits.va.gov/montgomery/	40.000%
	https://www.benefits.va.gov/GuardReser	
National Guard and Reserve	ve/	40.000%
Office of the General Counsel	https://www.va.gov/ogc	40.000%
The Office of Research and Development	https://www.research.va.gov	40.000%
VA External ListServ	https://www.listserv.va.gov	40.000%
Advisory Committee Management Office	https://www.va.gov/ADVISORY	36.000%
Creating Options for Veterans Expedited		00.00070
Recovery (COVER)	https://www.va.gov/cover	36.000%
Center for Faith-Based and Neighborhood		00.00070
Partnerships (CFBNP)	https://www.va.gov/CFBNP	35.000%
Health Economics Resource Center	https://www.herc.research.va.gov	33.000%
Office of Academic Affiliations	https://www.va.gov/oaa	33.000%
	https://www.va.gov/ogc/apps/accreditati	00.00070
OGC Accreditation Search	on	33.000%
	https://www.benefits.va.gov/privateprov	00.00070
Private Provider Information	iders/	33.000%
VA Office of Finance	https://www.va.gov/finance	33.000%
VA Plans, Budget, and Performance	https://www.va.gov/performance	33.000%
vha-history	https://www.va.gov/vha-history	33.000%
VHA Assault and Harassment Prevention	https://www.va.gov/STOP-HARASSMENT	00.00070
Office		31.000%
VA Adaptive Sports	https://www.va.gov/ADAPTIVESPORTS	30.000%
VA Health Services Research and	https://www.hsrd.research.va.gov	
Development Service		30.000%
Department of Veterans Affairs (DVA)		
OneVA Enterprise Architecture (OneVA EA)		
Internet Page	https://www.ea.oit.va.gov	28.000%
From War to Home	https://www.va.gov/fromwartohome/	28.000%
Information Related to the American	, ,, 101, 11111111111111111111111111111	
Recovery and Reinvestment Act of 2009	https://www.va.gov/recovery	26.000%
Franchise Fund	https://www.va.gov/fund	24.000%
	1 1 // - 0- /	

Web Automated Verification of Enrollment	https://www.gibill.va.gov/wavemobile/in	
(Mobile)	dex.do	24.000%
	https://www.va.gov/gulfwaradvisorycom	
Advisory Committee on Gulf War Veterans	mittee	23.000%
Labor-Management Relations	https://www.va.gov/lmr	22.000%
The Office of Employment Discrimination		
and Complaint Adjudication	https://www.oedca.va.gov	22.000%
VA Voluntary Service	https://www.cdceportal.va.gov/	21.000%
VA Careers	https://www.vacareers.va.gov	16.000%
National Center for Veterans Analysis and		
Statistics	https://www.va.gov/vetdata	13.000%
Office of Human Resources Management	https://www.va.gov/ohrm	7.000%
Open Government Initiative	https://www.va.gov/open	7.000%
Board of Veterans Appeals	https://www.bva.va.gov	5.000%
VA Exhibit 300	https://www.va.gov/exhibit300	4.000%
VA National HIV/AIDS Website	https://www.hiv.va.gov	3.000%
Benefits Enterprise Platform	https://benefits.vba.va.gov	0.000%
Internet Search	https://www.va.gov/search/	0.000%
National Center for PTSD	https://www.ptsd.va.gov/ptsd/	0.000%
VA Open Data	https://www.data.va.gov/	0.000%
Veterans Choice	https://www.va.gov/healthbenefits/apps	
	/choice	0.000%
Web Automated Verification of Enrollment	https://www.gibill.va.gov/wave/	0.000%



### Attachment 2. List of intranet website conformance levels

VA Site	URL	Compliance %
Federal Health Information		
Exchange/Bidirectional Health		
Information Exchange	http://vaww.va.gov/FHIE-BHIE/	100%
Hey VA!	http://vaww.va.gov/heyva/	100%
Office of General Counsel	http://vaww.va.gov/ogc/	100%
VHA Regulations	http://vaww.va.gov/vharegs/	100%
Regional Office Waco	http://vbaw.vba.va.gov/waco	100%
Veterans Relationship Management	http://vbaw.vba.va.gov/VRM	100%
Bar Code Resource Office	http://vaww.va.gov/barcode/	100%
Center for Human Factors in Patient	hus the second	4000/
Safety	http://vaww.va.gov/humanfactors/	100%
Central Blind Rehabilitation Center	http://vaww.va.gov/hinesblindrehab/	100%
DOD Coordination Office	http://vaww.dodcoordination.va.gov	100%
Inpatient Evaluation Center	http://vaww.va.gov/ipec/	100%
	https://dvagov.sharepoint.com/sites/VHAo	
Office of Academic Affiliations	aa/public/SitePages/OAA-Home.aspx	100%
Office of the Assistant Deputy Under		
Secretary for Health for Policy and		
Planning	https://vaww.va.gov/vhacso/	100%
San Francisco Intranet	https://dvagov.sharepoint.com/sites/VHAS FCHub/	100%
War Related Illness and Injury Study		
Center	http://vaww.warrelatedillness.va.gov	100%
Office of Privacy and Records		
Management	https://vaww.oprm.va.gov	99%
Section 508	http://vaww.section508.va.gov	98%
Columbia (SC) VA Home	http://vaww.columbiasc.va.gov	98%
Hepatitis C Intranet	https://www.hepatitis.va.gov	96%
Spinal Cord Injury / Disorders Services	http://vaww.sci.va.gov	95%
Office of Small and Disadvantaged		
Business Utilization	http://vaww.va.gov/osdbu/	94%
	http://vaww.va.gov/nationaloutreachoffice	
National Veterans Outreach Office	/	93%
VA Insider	http://vaww.insider.va.gov	93%
QPR-OIT	https://vaww.qpr.oit.va.gov	92%
Veterans Office of Rural Health	http://vaww.ruralhealth.va.gov	92%
Homeless Veterans	http://vaww.va.gov/homeless/	91%
Nutrition and Food Services	http://vaww.nutrition.va.gov	90%
VA Loma Linda Healthcare System	http://vaww.lomalinda.va.gov	90%
EHRM - Electronic Health Record	177	
Modernization	https://vaww.ehrm.va.gov	89%
Human Resources Information Service	http://vaww.va.gov/hris/	89%

Office of Regulation Policy and		
Management	http://vaww.va.gov/orpm/	89%
Health Informatics	http://vaww.va.gov/chio/	89%
Service Delivery and Engineering	http://vaww.sde.oit.va.gov	87%
VISN16 - South Central VA Health Care	Tittp://vaww.sac.oic.va.gov	0770
Network	http://vaww.visn16.va.gov	87%
Black Hills Healthcare System	http://vaww.blackhills.va.gov	86%
LNO - Library Network Office	http://vaww.va.gov/lno/	85%
Orlando VA Medical Center	http://vaww.orlando.va.gov	85%
Under Secretary for Health	http://vaww.ush.va.gov	85%
VA Acquisition Academy	http://vaww.asii.va.gov	84%
Office of Administration and Facilities	https://vbaw.vba.va.gov/oms/	0470
(OA&F)	Tittps://vbaw.vba.va.gov/oilis/	84%
National Center for Ethics in Health		0470
Care	http://vaww.ethics.va.gov	84%
	http://vaww.va.gov/opa/	83%
Public and Intergovernmental Affairs  VA Publications		
	http://vaww.va.gov/vapubs/	83%
Specialty Care Services	http://vaww.medicalsurgical.va.gov	83%
VA San Diego Healthcare System	http://vaww.sandiego.va.gov	81%
Congressional and Legislative Affairs	http://vaww.va.gov/oca/	80%
National Data Center Program	http://vaww.ndcp.oit.va.gov	80%
Office of Asset Enterprise Management	http://vaww.va.gov/oaem/	80%
Office of Budget	http://vaww.va.gov/budget/	80%
Social Media Request	http://vaww.va.gov/socialmedia/	80%
VA ECMS (TeamSite) Site Setup/Change		
Request	http://vaww.va.gov/cms/apps/TAT/	80%
VA Enterprise Systems Engineering	http://vaww.va.gov/eie/	80%
VACO Campus IT Support Services	http://vaww.vacocampusitss.oit.va.gov	80%
	https://vaww.vrm.km.va.gov/system/templ	
	ates/selfservice/va_kanew/help/agent/loca	
CBO Policy Guides	le/en-US/portal/55440000001001	80%
Geriatric Research Education and		
Clinical Centers	http://vaww.va.gov/grecc/	80%
Grand Junction VA Medical Center	http://vaww.grandjunction.va.gov	80%
Low ADL Monitoring Program	http://vaww.va.gov/lamp/	80%
Program Evaluation and Resource		
Center (PERC)	http://vaww.perc.va.gov	80%
Tomah VA Medical Center	http://vaww.tomah.va.gov	80%
VA Heart of Texas Health Care Network	http://vaww.heartoftexas.va.gov	80%
VA Sunshine Healthcare Network	http://vaww.visn8.va.gov	80%
VHA Social Work	http://vaww.socialwork.va.gov	80%
VHA Telehealth Services	http://vaww.telehealth.va.gov	80%
vhacos	https://vaww.vhacos.va.gov	80%
VISN 19 Intranet	http://vaww.visn19.va.gov	80%
VISN 4 Intranet	http://vaww.visn4.va.gov	80%
WHSAssessmentTool	http://vaww.WHSAssessmentTool.va.gov	80%

Center for the Study of Healthcare		
Provider Behavior	https://www.cshiip.research.va.gov/	79%
VA PKI Information and Enrollment		
Portal	http://vaww.pki.va.gov	78%
Sioux Falls VA Health Care System	http://vaww.siouxfalls.va.gov	78%
VA Voluntary Service	http://vaww.volunteer.va.gov	78%
Client Service Initiative	http://vaww.csi.va.gov	77%
Energy Management Program Service		
(EMPS)	http://vaww.energy.va.gov	77%
Cleveland - VHA Web Communications	9, 0	
Blog	http://vaww.blog.va.gov/cleveland/	77%
Minneapolis VA Health Care System	http://vaww.minneapolis.va.gov	77%
Public Health	http://vaww.publichealth.va.gov	77%
Office of Operations, Security, and		
Preparedness	https://vaww.osp.va.gov	76%
Computerized Patient Record System	1 77	
(CPRS)	http://vaww.va.gov/CPRS	76%
Office of Performance Management	http://vaww.va.gov/performance/	75%
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RAPID	/apiDefault.aspx	75%
HR Transformation	http://vaww.va.gov/hrtransformation/	73%
National Center for PTSD	http://vaww.ptsd.va.gov	72%
VA Caribbean Healthcare System	http://vaww.caribbean.va.gov	72%
ALTOONA - James E. Van Zandt Intranet		
Home	https://vaww.altoona.va.gov	71%
Office of Strategic Planning	https://vbaw.vba.va.gov/osic/	70%
St. Cloud VA Health Care System	http://vaww.stcloud.va.gov	70%
Deputy Under Secretary for Health		
(DUSHOM)	http://vaww.dushom.va.gov	69%
eHealth intranet	http://vaww.ehealth.va.gov	69%
Health Systems Office	http://vaww.va.gov/esm/	69%
VA Illiana Health Care System, Danville,		
Illinois	http://vaww.danville.va.gov	69%
Wilkes-Barre VA Medical Center	http://vaww.wilkes-barre.va.gov	69%
North Florida/South Georgia Veterans		
Health System	http://vaww.northflorida.va.gov	68%
VA Midwest Health Care Network	http://vaww.visn23.va.gov	68%
VA Federal Supply Schedule	http://vaww.fss.va.gov	67%
CART - VA Clinical Assessment,	https://vaww.qps.med.va.gov/divisions/api	
Reporting, and Tracking Program	/csde/csdeCart.aspx	67%
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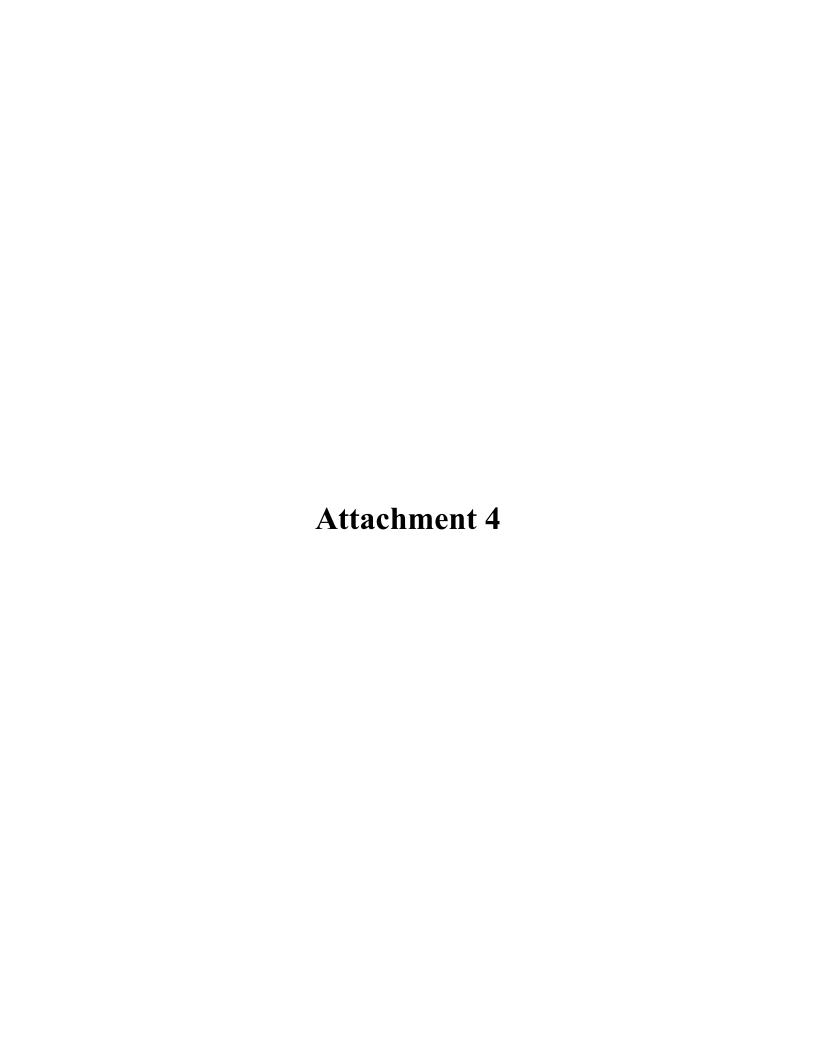
VHA National Center for Health		
Promotion and Disease Prevention	http://vaww.prevention.va.gov	65%
Sheridan Intranet	http://vaww.sheridan.va.gov	64%
Office of Finance	http://vaww.va.gov/finance/	63%
Coatesville VA Medical Center	http://vaww.coatesville.va.gov	63%
Electronic Support for Patient Decisions	1 77	
(ESPD)	http://vaww.patientdecisions.va.gov	63%
Miami VA Healthcare System	http://vaww.miami.va.gov	63%
Birmingham VAMC	http://vaww.birmingham.va.gov	62%
Mental Illness Research, Education and		
Clinical Centers	http://vaww.mirecc.va.gov	62%
Facility and Leadership Directory	http://vaww.va.gov/directory/	61%
	http://vaww.index.va.gov/search/va/index.	
Intranet Search	jsp	61%
VA Facilities Management	http://vaww.vafm.va.gov	61%
Jonathan M. Wainwright Memorial VA		
Medical Center	http://vaww.wallawalla.va.gov	61%
VA Healthcare System of Ohio	http://vaww.visn10.va.gov	61%
Implementation Center	http://vbaw.vba.va.gov/ic	60%
Office of Client Relations (OCR)	http://vaww.ocr.va.gov	60%
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VA National Transplant Program	plant/	60%
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Home	http://vaww.visn2.va.gov	58%
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ESE Telecommunications Engineering		
and Design	http://vaww.netops.oit.va.gov	56%
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Saginaw, Michigan	http://vaww.saginaw.va.gov	55%
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VA Information Resource Center	http://vaww.virec.research.va.gov	55%
Washington DC VA Medical Center	http://vaww.washingtondc.va.gov	55%
Board of Veterans Appeals	http://vaww.bva.va.gov	54%
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Center for Minority Veterans	rans/	53%
Office of Procurement, Acquisition and		
Logistics	https://vaww.va.gov/opal/	53%

VHA Forms, Publications, and Records	T	
Management	http://vaww.va.gov/vhapublications/	52%
National Cemetery Administration	http://vaww.nca.va.gov	51%
Office of the Executive Secretariat	http://vaww.execsec.va.gov	51%
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Information	http://vaww.trainingevents.va.gov	51%
Lebanon VA Medical Center	http://vaww.lebanon.va.gov	51%
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System	http://vaww.SOUTHTEXAS.va.gov	51%
Eastern Oklahoma VA Health Care		500/
System Home	http://vaww.muskogee.va.gov	50%
MDRO Prevention Initiative	http://vaww.mrsa.va.gov	50%
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PCCGuidebookSelfAssessment	fAssessment	50%
VA Pittsburgh Healthcare System	http://vaww.pittsburgh.va.gov	49%
Carl Vinson VA Medical Center		
(CVVAMC) Home	http://vaww.dublin.va.gov	48%
Healthcare Analysis & Information		
Group	http://vaww.va.gov/haig/	48%
VA Central Iowa Health Care System	http://vaww.centraliowa.va.gov	47%
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System (CAVHCS)	http://vaww.centralalabama.va.gov	45%
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Veteran Access Research Consortium -		
ACCESSRESEARCH	https://vaww.va.gov/ACCESSRESEARCH/	44%
Atlanta VAMC Intranet Home	http://vaww.atlanta.va.gov	43%
Corporate Senior Executive	, , , ,	
Management Office (CSEMO)	http://vaww.va.gov/CSEMO/	43%
Financial Management Business	1 11 2 102 11 22 2 11 21	
Transformation Service (FMBTS)	https://vaww.va.gov/fmbts	43%
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Primary Care Program Office	http://vaww.va.gov/ndrsing/	43%
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System	http://vaww.lasvegas.va.gov	43%
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	http://vaww.beckley.va.gov http://vaww.eex.va.gov https://vaww.va.gov/com/leaders.asp

VA Palo Alto Health Care System net	https://vaww.paloalto.va.gov	39%
Corporal Michael J. Crescenz VAMC	http://vaww.philadelphia.va.gov	38%
National Radiation Oncology Program	http://vaww.radiationoncology.va.gov	38%
VA Sierra Nevada Health Care System	http://vaww.reno.va.gov	38%
Financial Management System Services	http://vaww.va.gov/fmshome/	37%
Office of Human Resources	7 77 3 7	
Management (OHRM)	http://vaww.va.gov/ohrm/	37%
Vet Center - Intranet	https://vaww.vetcenter.va.gov	37%
VA Montana Health Care System	http://vaww.montana.va.gov	36%
VistA Maintenance	http://vaww.va.gov/vistamaintenance/	35%
	http://vbaw.vba.va.gov/pensionandfiduciar	
Pension and Fiduciary Service	у	35%
VA 6102 Internet/ Intranet Policy	http://vaww.va.gov/6102/	34%
Michael E. DeBakey VA Medical Center	http://vaww.houston.va.gov	34%
VA Denver Research (VADR)	http://vaww.denver.research.va.gov	34%
Human Resources & Administration	http://vaww.va.gov/employee	33%
Health Economics Resource Center	http://vaww.herc.research.va.gov	33%
VA Texas Valley Coastal Bend Health	Tittp://vaww.nere.researen.va.gov	3370
Care System	http://vaww.texasvalley.va.gov	33%
Central Texas Veterans Health Care	Tittp://vaww.texasvailey.va.gov	3370
System	http://vaww.centraltexas.va.gov	32%
Dayton VA Medical Center Intranet	Tittp://vaww.centraitexas.va.gov	3270
Home	https://vaww.dayton.va.gov	32%
Office of Acquisition and Logistics (OAL)	http://vaww.va.gov/oal/	31%
Office of Construction & Facilities	Tittp://vaww.va.gov/oai/	3170
Management	http://vaww.cfm.va.gov	30%
VA Forms	http://vaww.va.gov/VAForms/	28%
RSS Library	http://vaww.va.gov/rss/	27%
Office of Resolution Management	http://vaww.va.gov/rss/	26%
OneVA Enterprise Architecture	http://vaww.ea.oit.va.gov	25%
Wilmington VA Medical Center	http://vaww.wilmington.va.gov	25%
Office of Business Process Integration	https://vbaw.vba.va.gov/OBI/	24%
FSC Direct	http://vaww.fscdirect.fsc.va.gov	23%
VA North Texas Health Care System	http://vaww.northtexas.va.gov	23%
VA Hiring Reform Initiative	http://vaww.northtexas.va.gov http://vaww.va.gov/HiringReform/	22%
Clarksburg VA Medical Center	http://vaww.va.gov/mmgkerom/ http://vaww.clarksburg.va.gov	22%
Office of Research and Development	http://vaww.research.va.gov	22%
Franchise Fund Program Support Office (NDS/FFPSO)	http://vaww.franchisefund.med.va.gov	21%
Health Service Research and		
Development Service (HSRD)	http://vaww.hsrd.research.va.gov	21%
Office of Business Oversight (OBO)	http://vaww.va.gov/obo/	19%
Eastern Colorado Health Care System	http://vaww.denver.va.gov	18%
Inquiry Routing and Information System (IRIS)	http://vaww.va.gov/irisinfo/	15%
HSRD Computer Support	http://vaww.va.gov/hsrdcomputersupport/	13%
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Huntington VA Medical Center Home	http://vaww.huntington.va.gov	13%
Northern Indiana Health Care System	http://vaww.northernindiana.va.gov	13%
VA Butler Healthcare	http://vaww.butler.va.gov	12%
Vetlink	https://vaww.vetlink.va.gov	12%
Franchise Fund	http://vaww.va.gov/fund/	11%
VA Web Operations	https://vaww.webops.va.gov	11%
HLTI - Healthcare leadership talent		
institute	https://vaww.hlti.va.gov	6%
Business Management Transformation		
Team	http://vaww.va.gov/bmtt/	5%
HIV Intranet	https://www.hiv.va.gov	3%
Managerial Cost Accounting Office		
(MCAO) Blog	http://vaww.blog.va.gov/mcao/	2%
OIA Connection Blog	http://vaww.blog.va.gov/oia/	2%
Hawaii - Pacific Islands Health Care		
System	https://vaww.hawaii.va.gov	1%
VA Library Network	http://vaww.blog.va.gov/lno/	1%
VA Acronym Lookup	http://vaww.va.gov/acronyms/	0%
VA Internal ListServ	http://vaww.listserv.va.gov	0%
VA Phone Book	http://vaww.va.gov/PhoneBook/	0%
WebMetrics	https://vaww.webmetrics.eo.va.gov	0%
Battle creek VA Med center	https://vaww.battlecreek.va.gov	0%
Martinsburg VAMC Intranet	http://vaww.martinsburg.va.gov	0%
	https://vaww.va.gov/COMMUNITYCARE/A	
VA Community Provider Locator	pps/providerlocator/	0%



# A3.0 Notice of the Federal Accessibility Law Affecting All Information and Communication Technology (ICT) Procurements (Section 508)

(Three standards listed in Section A3.1 below [E205 Electronic Content – (Accessibility Standard -WCAG 2.0 Level A and AA Guidelines), E204 Functional Performance Criteria, and E208 Support Documentation and Services] always apply to the evaluation of ICT, and should remain marked as "x". The requiring activity should un-mark any of the other remaining standards below [E206 and/or E207] that do not apply to this effort. The Accessibility Requirements Tool (ART) is a web-based application that will help the requiring activity determine the Section 508 standards that apply to their specific acquisition. The ART tool is located at <a href="https://app.buyaccessible.gov/home.">https://app.buyaccessible.gov/home.</a>)

On January 18, 2017, the Architectural and Transportation Barriers Compliance Board (Access Board) revised and updated, in a single rulemaking, standards for electronic and information technology developed, procured, maintained, or used by Federal agencies covered by Section 508 of the Rehabilitation Act of 1973, as well as our guidelines for telecommunications equipment and customer premises equipment covered by Section 255 of the Communications Act of 1934. The revisions and updates to the Section 508-based standards and Section 255-based guidelines are intended to ensure that information and communication technology (ICT) covered by the respective statutes is accessible to and usable by individuals with disabilities.

### A.3.1. Section 508 – Information and Communication Technology (ICT) Standards

The Section 508 standards established by the Access Board are incorporated into, and made part of all VA orders, solicitations and purchase orders developed to procure ICT. These standards are found in their entirety at: <a href="https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/text-of-the-standards-and-guidelines">https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/text-of-the-standards-and-guidelines</a>. A printed copy of the standards will be supplied upon request.

Federal agencies must comply with the updated Section 508 Standards beginning on January 18, 2018. The Final Rule as published in the Federal Register is available from the Access Board: <a href="https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule">https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule</a>.

The Contractor shall comply with "508 Chapter 2: Scoping Requirements" for all electronic ICT and content delivered under this contract. Specifically, as appropriate for the technology and its functionality, the Contractor shall comply with the technical standards marked here:

X	E204 Functional Performance Criteria
$\boxtimes$	E206 Hardware Requirements
$\times$	E207 Software Requirements
X	E208 Support Documentation and Services Requirements

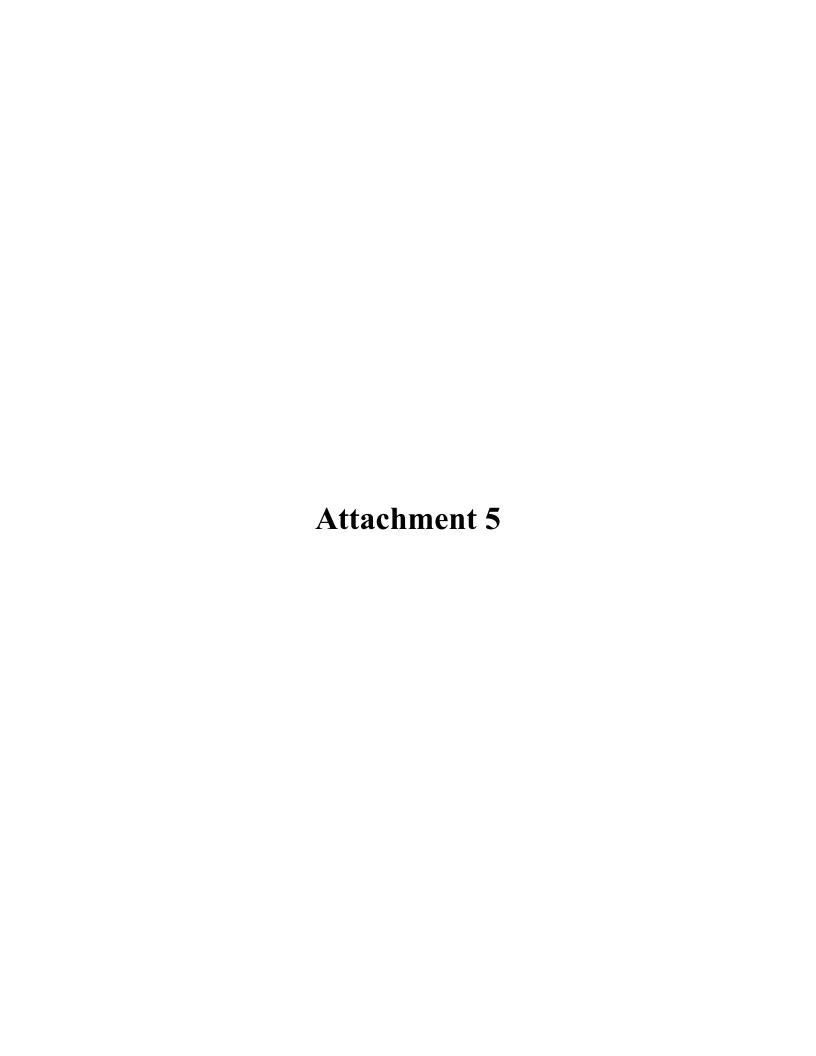
### A.3.2. Compatibility with Assistive Technology

The standards do not require installation of specific accessibility-related software or attachment of an assistive technology device. Section 508 requires that ICT be compatible with such software and devices so that ICT can be accessible to and usable by individuals using assistive technology, including but not limited to screen readers, screen magnifiers, and speech recognition software.

### A.3.3. Acceptance and Acceptance Testing

Deliverables resulting from this solicitation will be accepted based in part on satisfaction of the Section 508 Chapter 2: Scoping Requirements standards identified above.

The Government reserves the right to test for Section 508 Compliance before delivery. The Contractor shall be able to demonstrate Section 508 Compliance upon delivery.



# **DEPARTMENT OF VETERANS AFFAIRS**

# **EVALUATION OF TECHNICAL CRITERIA**

**FOR** 

**SECTION 508** 

## Updated May 31, 2018

Based on a format provided by the Department of Health and Human Services Section 508 Program

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## Guide to Completing the Evaluation of Technical Criteria

## **Purpose**

This document provides instructions on evaluating vendors' responses to Section 508 Technical Standards for the Department of Veterans Affairs.

## **Background**

This Evaluation of Technical Criteria provides a checklist that allows Technology Acquisition Center (TAC) and other officials to evaluate (using a structured method) whether a product <u>does</u> or <u>does not</u> meet various Section 508 Requirements in a Request for Proposal (RFP), and if a product <u>does</u> meet them, the extent to which Requirements are satisfied.

The word "conformance" is used throughout this document. This term is used interchangeably with "compliance." For clarification, the website Section508.gov explains the difference in this way:

Compliance is whether or not a Federal agency has met the legal requirements of Section 508. Conformance means providing ICT that meets applicable parts of the Section 508 standards.

In summary:

Federal agencies must comply with the Section 508 law. Vendor's products and services shall conform to Section 508 standards.

The Technical Standards referenced are Revised Section 508 Standards, commonly known as the "508 Refresh" enacted in January 18, 2018. These Standards reference the term "information and communication technology" (ICT). ICT is information technology (IT), as defined by Federal Acquisition Regulations (FAR) section 2.101: "any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information." In addition to IT, ICT includes telecommunication products such as telephones; information kiosks; transaction machines; World Wide Web sites; multimedia (including videotapes); and office equipment, such as copiers and fax machines.

Scope of Revised Section 508 Standards is ICT that is procured, developed, maintained, or used by agencies shall conform to the Revised 508 Standards.

The Access Board's Executive Summary of the Revised Section 508 Standards makes it clear that Section 508 has been expanded "by reference." This means Section 508 incorporated parts of the international standard known as the Web Content Accessibility Guidelines (WCAG) by making specific reference to a standard, rather than quoting it.

Excerpt from the Executive Summary:

2. Broad Application of Web Content Accessibility Guidelines 2.0
The Revised 508 Standards...incorporate by reference the Web Content Accessibility Guidelines (WCAG) 2.0, a globally-recognized and technologically-neutral set of accessibility guidelines for Web content. For Section 508-covered ICT, all covered Web and non-Web content and software – including, for example, Web sites, intranets, word processing documents, portable document format documents, and project management software – is required, with a few specific exceptions, to conform to WCAG 2.0's Level A and Level AA Success Criteria and Conformance Requirements....

#### Source:

https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/i-executive-summary.

## Organization of the Evaluation of Technical Criteria Checklist

The Evaluation of Technical Criteria Checklist ("Evaluation Checklist") used below consists of items which guide assessment of a technical evaluation, including information which organizes and summarizes the results. Use the "Steps to Conducting an Assessment" (below) to follow a structured process in making an assessment.

**NOTE**: Some hyperlinks in this document may not function properly. Although the pound sign ("#") is a valid character to use in a URL file name, it may not be function in hyperlinks in Microsoft Office documents. If a hyperlink does not function, copy it from this document and paste it into the "location" window in a browser; press <Enter>.

## **Steps to Conducting an Assessment**

- 1. Read through "Definitions" below and use them to determine the type of technology of your acquisition. Because the 508 Refresh is organized by functional characteristics, some technology fits more than one definition. Make note of each definition.
- 2. Below definition(s) describing a technology, are Criteria Checklists to be used for the assessment. Make note which Criteria Checklist to use.
- 3. Read "How to Fill Out the Criteria Checklists" below for an understanding of Checklist organization.
- 4. Fill out each Criteria Checklists that apply to a technology assessment. It is within these *Criteria Checklists* that an Evaluator will define in detail how a product **does** or **does not** conform to a specific technical requirement.
  - Be aware that the Checklists for Functional Performance Criteria and Documentation and Support Services Criteria are required for all ICT, in addition to a technology-specific Criteria Checklist(s).
- 5. Consult "Filling Out 'Overall Summary of Evaluation' Table" for guidance on columns used in the summary table.
- 6. Fill out the VA Section 508 Evaluation Summary and the Overall Summary of Evaluation Table. This Table describes a product's **overall** "level-of-conformance" with Section 508 Standards and is the final compilation of results.

### **Definitions**

Below are definitions for types of technology. Refer to these definitions to determine which part(s) of this document to use. Choose the correct section(s) describing the acquisition; Multiple Criteria Checklists may apply. Please read them all, since several are very similar. If unable to determine the correct category(ies), please contact the Section 508 Office.

<u>Please note: the Checklists for 'Functional Performance Criteria and Documentation' and 'Support Services Criteria' are required for all ICT.</u>

<u>WEB CONTENT ACCESSIBILITY GUIDELINES (WCAG)</u>: A globally-recognized and technologically-neutral set of accessibility guidelines for Web content. For Section 508-covered ICT, all covered Web and non-Web content and

software (e.g., Web sites, intranets, word processing documents, portable document format documents, and project management software) is required, with a few specific exceptions, to conform to WCAG 2.0's Level A and Level AA Success Criteria. The revised requirements adapt the existing 508 Standards to reflect the newer multifunction technologies (e.g., smartphones that have telecommunications functions, video cameras, and computer-like data processing capabilities) and address the accessibility challenges that these technologies pose for individuals with disabilities.

**CHECKLIST(S) TO USE**: Web Content Accessibility Guidelines (WCAG) is used in evaluating particular technologies, as shown in definitions below.

<u>HARDWARE:</u> This table is for projects and products that are hardware projects destined for the end user community. Hardware is a tangible device, equipment, or physical component of ICT, such as telephones, computers, multifunction copy machines, and keyboards. Hardware is self-contained; any embedded software running on hardware is self-contained on the hardware.

**CHECKLIST(S) TO USE:** Functional Performance Criteria, Platform Hardware Criteria, Documentation and Support Services Criteria.

<u>WEB BASED APPLICATION</u>: Applications that are executed by going to a URL in a browser are web applications. This includes internet and intranet sites. This includes sites that require no authentication or extreme multi-factor authentication. This does not include web applications that are specifically designed to be executed only on a mobile device but those applications that are responsive and designed for both mobile and non-mobile device are included.

**CHECKLIST(S) TO USE:** Web Content Accessibility Guidelines (WCAG) Criteria, Functional Performance Criteria, Platform Software Criteria, Documentation and Support Services Criteria.

**NON-WEB BASED APPLICATIONS (INCLUDES MOBILE):** Applications that are designed to run on a desktop or laptop and do not run within a browser are general non-web software applications. This includes applications like Microsoft Word and MacAfee anti-virus but also includes mobile applications that run on a mobile platform.

**CHECKLIST(S) TO USE:** Web Content Accessibility Guidelines (WCAG) Criteria, Functional Performance Criteria, Applications, Documentation and Support Services Criteria.

**NOTE**: Although the application is "Non-Web Based," there are occasions when parts of the WCAG standards will apply, therefore this checklist should be employed. This is limited only to Level A and AA criteria.

PLATFORM WEB BASED APPLICATION – WEB BASED PRODUCT: This includes web based applications that are also defined as platforms. The definition of Platform can be nebulous. In defining Platform Services, the Access Board writes: examples of platforms are: desktop operating systems; embedded operating systems, including mobile systems; Web browsers; plug-ins to Web browsers that render a specific media or format; and sets of components that allow other applications to execute, such as applications which support macros or scripting. An application like SharePoint is a platform since you can develop applications within it.

**CHECKLIST(S) TO USE:** Web Content Accessibility Guidelines (WCAG) Criteria, Functional Performance Criteria, Platform Software Criteria, Applications Criteria, Documentation and Support Services Criteria.

#### PLATFORM NON-WEB BASED APPLICATIONS AND GENERAL NON-WEB SOFTWARE (INCLUDES MOBILE):

This includes non-web based applications that are also defined as platforms. The definition of Platform can be nebulous. In defining Platform Services, the Access Board writes: examples of platforms are: desktop operating systems; embedded operating systems, including mobile systems; Web browsers; plug-ins to Web browsers that render a specific media or format; and sets of components that allow other applications to execute, such as applications which support macros or scripting. An application like Microsoft Windows 10 is a platform since you can develop applications within it.

**CHECKLIST(S) TO USE:** Web Content Accessibility Guidelines (WCAG) Criteria, Functional Performance Criteria, Platform Software Criteria, Documentation and Support Services Criteria.

**NOTE**: Although the application is "Non-Web Based," there are occasions when parts of the WCAG standards will apply, therefore this checklist should be employed. This is limited only to Level A and AA criteria.

#### **LEGACY SOFTWARE PROJECT:**

In the VA, the term "legacy" is used to mean software technology projects that are built using what is now an older software or technology which, due to the changes in technologies and software, cannot easily be made 508 conformant by the developers. Examples include projects coded in MUMPS, or older version of Delphi or Visual Basic.

CHECKLIST(S) TO USE: Functional Performance Criteria, Documentation and Support Services Criteria.

#### **AUTHORING TOOL WEB BASED APPLICATION:**

This includes web based applications that are also defined as authoring tools. Authoring tools are defined as any software, or collection of software components, that can be used by authors, alone or collaboratively, to create or modify content for use by others, including other authors. In plain English, an authoring tool is anything that allows someone to create content and save that content as a separate file, including code editors and development frameworks. An example of an authoring tool is a project that creates content that is then viewed by a user. Creating an HTML table and populating it from a database does not make it an authoring tool. Creating reports that can be downloaded as PDFs does make it an authoring tool.

**CHECKLIST(S) TO USE:** Web Content Accessibility Guidelines (WCAG) Criteria, Functional Performance Criteria, Authoring Tools Criteria, Documentation and Support Services Criteria.

#### **AUTHORING TOOL NON-WEB BASED APPLICATION:**

This includes non-web based applications that are also defined as authoring tools. Authoring tools are defined as any software, or collection of software components, that can be used by authors, alone or collaboratively, to create or modify content for use by others, including other authors. In plain English, an authoring tool is anything that allows a user to create content and save that content as a separate file, including code editors and development frameworks. An example of an authoring tool is Visual Studios, a product that creates code that must be conformant. (Note: Using Visual studios as your IDE does not make your project an authoring tool.).

**CHECKLIST(S) TO USE**: Web Content Accessibility Guidelines (WCAG) Criteria, Functional Performance Criteria, Authoring Tools Criteria, Documentation and Support Services Criteria.

#### **EXCEPTIONS:**

Exceptions are limited to those specifically defined in the text of the law as Exceptions. Exceptions include National Security Systems, Software incidental to a federal contract, Functions located in maintenance closets, and Undue Burdens or Fundamental Alterations. Even with an Exception, there may be a requirement to provide individuals with disabilities access to, and use of, information and data by an alternative means that meets identified needs. If ICT qualifies for an Exception, the Checklists for 'Functional Performance Criteria and Documentation' and 'Support Services Criteria' are not required.

CHECKLIST(S) TO USE: For ICT Exceptions, please contact the Section 508 Office using Section508@va.gov.

#### **NO USER INTERFACE:**

Products that have no user interface include products that are middle-tier (database updates, business-to-business interfaces, etc.). If the ICT has No User Interface, the Checklists for 'Functional Performance Criteria and Documentation' and 'Support Services Criteria' are not required.

## **How to Fill Out the Criteria Checklists**

Use the following Column Name descriptions and Values to Use on Criteria Checklist in assessing a technology and filling out the Criteria Checklist Tables in this Evaluation document.

Column Name	Values to Use on Criteria Checklist			
ID:	Identifies a specific guideline within Criteria Checklist Tables. These ID's are already shown in the Criteria Tables.			
Criteria:	States a specific criterion within Criteria Checklist Tables. These Criteria are already shown in the Criteria Tables.			
Supporting Features:	<ol> <li>Enter information summarizing a product's "level-of-support" for specific criteria. Use only one of the following terms or phrases for each individual Criterion on the Checklist:         <ol> <li>"Supports" - Product FULLY meets the letter and intent of the Criterion.</li> <li>"Supports with Exceptions" - Product does not ENTIRELY meet the letter and intent of the Criterion, but does provide some level of access.</li> <li>"Supports through Equivalent Facilitation" - Product provides alternative methods to meet the intent of the Criterion.</li> <li>"Does not Support" - Product does not meet the letter or intent of the Criterion.</li> <li>"Not Applicable" - The Criterion does not apply to the product.</li> </ol> </li> </ol>			
Remarks/Explanations:	<ul> <li>Enter detailed information on how the product did or did not support specific criteria. Use only one of the following terms or phrases for each Criterion on the Checklist:  1. If your Supporting Features indicates "Supports," then list exactly what features of the product do meet and describe how they are used to support the Criterion.  2. If your Supporting Features indicates "Supports with Exceptions," then  • List exactly what features of the product do meet and describe how they are used to support the Criterion.  AND  • List exactly what parts of the product do not meet and describe how they fail to support the Criterion.  3. If your Supporting Features indicates "Supports through Equivalent Facilitation," then list exactly what other methods exist in the product and describe how they are used to support the Criterion.  4. If your Supporting Features indicates "Does not Support," then Describe exactly how the product does not support the Criterion.</li> </ul>			

Column Name	Values to Use on Criteria Checklist		
	<ol> <li>If your Supporting Features indicates "Not Applicable," then Describe exactly why the criterion is not applicable to the product.</li> </ol>		

# Filling Out "Overall Summary of Evaluation" Table

Fill the Table out after assessing a technology using the Criteria Tables. Examine the results in the Criteria Checklists and summarize in the "Overall Summary of Evaluation Table" below. Information to be placed in the columns is shown here.

Column Name	Use	
Criteria:	Web Content Accessibility Guidelines (WCAG) 2.0 Functional Performance Criteria Platform Hardware Criteria Platform Software Criteria Applications Criteria Authoring Tools Criteria Documentation and Support Services Criteria	
Supporting Features:	<u>Enter</u> information summarizing a product's overall technical "level-of support" for the corresponding type of Criteria (e.g., Functional Performance Criteria, Platform Software Criteria, etc.) or, when appropriate, specify <i>Not Applicable</i> .  IF ENTERING "NOT APPLICABLE," DO NOT ENTER REMARKS OR EXPLANATIONS IN THIS COLUMN.	
Remarks/Explanations:	<u>Enter</u> general comments regarding a product's overall "level-of-conformance" with the <i>Applicable</i> Criteria type.	

## **VA Section 508 Evaluation Criteria**

**Date:	
**Name of Product:	
**Acronym for Product:	
**Contact for more Information:	

# **Overall Summary of Evaluation**

Criteria Tables	Supporting Features Remarks and Explanations
Web Content Accessibility Guidelines (WCAG)	
**Functional Performance	
Platform Hardware	
Platform Software	
<u>Applications</u>	
Authoring Tools	
**Documentation and Support Services	

<sup>\*\*</sup> Denotes Required

# Criteria Checklist: Web Content Accessibility Guidelines (WCAG)

\* For details on the criteria listed below, see: http://www.w3.org/WAI/WCAG20/quickref/

ID	Criteria	Supporting Features	Remarks and explanations
WCAG 1.1.1	Non-text Content: All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, except for the situations listed below. (Level A)  Controls, Input: If non-text content is a control or accepts user input, then it has a name that describes its purpose. (Refer to Guideline 4.1 for additional requirements for controls and content that accepts user input.)  Time-Based Media: If non-text content is time-based media, then text alternatives at least provide descriptive identification of the non-text content. (Refer to Guideline 1.2 for additional requirements for media.)  Test: If non-text content is a test or exercise that would be invalid if presented in text, then text alternatives at least provide descriptive identification of the non-text content.  Sensory: If non-text content is primarily intended to create a specific sensory experience, then text alternatives at least provide descriptive identification of the non-text content.  CAPTCHA: If the purpose of non-text content is to confirm that content is being accessed by a person rather than a computer, then text alternatives that identify and describe the purpose of the non-text content are provided, and alternative forms of CAPTCHA using output modes for different types of sensory perception are provided to accommodate different disabilities.  Decoration, Formatting, Invisible: If non-text content is pure decoration, is used only for visual formatting, or is not presented to users, then it is implemented in a way that it can be ignored by assistive technology.  Do all non-decorative graphics have a textual equivalent that expresses the meaning of the element?  Do all buttons, checkboxes, and other form fields have a label or text alternative?  Do all tables have a text equivalent describing the purpose of the table?  Do all other non-text objects (graphs, charts, audio players, etc) have a textual equivalent?		
WCAG 1.2.1	Audio-only and Video-only (Pre-recorded): For prerecorded audio-only and prerecorded video-		

ID	Criteria	Supporting Features	Remarks and explanations
	only media, the following are true, except when the audio or video is a media alternative for text and is clearly labeled as such: (Level A)  Prerecorded Audio-only: An alternative for time-based media is provided that presents equivalent information for prerecorded audio-only content.  Prerecorded Video-only: Either an alternative for time-based media or an audio track is provided that presents equivalent information for prerecorded video-only content.  • For an audio file, do you have a transcript with the same information as in the audio file?  • For a video file, do you have accurate audio descriptions in the video file?  Or do you have a transcript that describes the content in the video file?		
WCAG 1.2.2	<ul> <li>Captions (Pre-recorded): Captions are provided for all prerecorded audio content in synchronized media, except when the media is a media alternative for text and is clearly labeled as such (Level A).</li> <li>Are captions provided for all prerecorded audio content in synchronized media, except when the media is a media alternative for text and is clearly labeled as such?</li> </ul>		
WCAG 1.2.3	<ul> <li>Audio Description or Media Alternative (Prerecorded): An alternative for time-based media or audio description of the prerecorded video content is provided for synchronized media, except when the media is a media alternative for text and is clearly labeled as such. (Level A)</li> <li>Is all the information in the video track provided in the audio track? If so, no audio description is necessary.</li> <li>Is the visual information in the multi-media described in an available audio description file or a text based equivalent?</li> </ul>		
WCAG 1.2.4	Captions (Live): Captions are provided for all live audio content in synchronized media. (Level AA)  • Does the live video broadcast include captions?		
WCAG 1.2.5	Audio Description (Pre-recorded): Audio description is provided for all prerecorded video content in synchronized media. (Level AA)  Is all the information in the video track already provided in the audio track? If so, no audio description is necessary?		

ID	Criteria	Supporting Features	Remarks and explanations
	<ul> <li>Is the visual information in the multi-media described in an available audio description file or a text based equivalent?</li> </ul>		
WCAG 1.3.1	<ul> <li>Info and Relationships: Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text. (Level A)</li> <li>If there is a visible structure that is necessary to understand the data on the page is that structure available to the screen reader?</li> </ul>		
WCAG 1.3.2	<ul> <li>Meaningful Sequence: When the sequence in which content is presented affects its meaning, a correct reading sequence can be programmatically determined. (Level A)</li> <li>If the sequence of content is important, does the Assistive Technology screen reader, i.e. JAWS or NVDA read the content in the correct sequence?</li> </ul>		
WCAG 1.3.3	Sensory Characteristics: Instructions provided for understanding and operating content do not rely solely on sensory characteristics of components such as shape, size, visual location, orientation, or sound. (Level A)  Is information portrayed by color, shape, size visual location, orientation or sound also portrayed in some other form?		
WCAG 1.4.1	<ul> <li>Use of Color: Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element. (Level A)</li> <li>Is any information portrayed by color also portrayed in some other manner?</li> </ul>		
WCAG 1.4.2	If any audio on a Web page plays automatically for more than 3 seconds, either a mechanism is available to pause or stop the audio, or a mechanism is available to control audio volume independently from the overall system volume level. (Level A)  If audio starts automatically on page load, does it stop before reaching three seconds OR is there a way to mute or stop the audio from playing without muting the screen reader?		
WCAG 1.4.3	Contrast (Minimum): The visual presentation of text and images of text has a contrast ratio of at least 4.5:1, except for the following: (Level AA) Large Text: Large-scale text and images of large-scale text have a contrast ratio of at least 3:1		

ID	Criteria	Supporting Features	Remarks and explanations
	Incidental: Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement.  Logotypes: Text that is part of a logo or brand name has no minimum contrast requirement.  Is the contrast of normal text at least 4.5 to 1?  Is the contrast of large text at least 3 to 1?		
WCAG 1.4.4	Resize text: Except for captions and images of text, text can be resized without assistive technology up to 200 percent without loss of content or functionality. (Level AA)  • When zooming the content to 200% is all content and functionality clear and available?		
WCAG 1.4.5	Images of Text: If the technologies being used can achieve the visual presentation, text is used to convey information rather than images of text except for the following: (Level AA)  Customizable: The image of text can be visually customized to the user's requirements  Essential: A particular presentation of text is essential to the information being conveyed  Is there valid justification for all uses of text in an image?		
WCAG 2.1.1	<ul> <li>Keyboard: All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes, except where the underlying function requires input that depends on the path of the user's movement and not just the endpoints. (Level A)</li> <li>When tabbing through the application can all content and functionality be accessed? If not, can the actionable item be reached via a hot key?</li> <li>If hot keys are used, do the hot keys have instructions to guide the user on how to use them? Do the instructions work with screen reader software?</li> </ul>		
WCAG 2.1.2	No Keyboard Trap: If keyboard focus can be moved to a component of the page using a keyboard interface, then focus can be moved away from that component using only a keyboard interface, and, if it requires more than unmodified arrow or tab keys or other standard exit methods, the user is advised of the method for moving focus away. (Level A)  If the user can move the cursor focus into a control or section of a page, can the user move		

ID	Criteria	Supporting Features	Remarks and explanations
	<ul> <li>the cursor focus away from that control or section?</li> <li>If the user cannot tab away from the control or section, is there a documented method for the user to 'un-trap' the keyboard?</li> </ul>		
WCAG 2.2.1	Timing Adjustable: For each time limit that is set by the content, at least one of the following is true: (Level A)  Turn off: The user is allowed to turn off the time limit before encountering it; or  Adjust: The user is allowed to adjust the time limit before encountering it over a wide range that is at least ten times the length of the default setting; or  Extend: The user is warned before time expires and given at least 20 seconds to extend the time limit with a simple action (for example, "press the space bar"), and the user is allowed to extend the time limit at least ten times; or  Real-time Exception: The time limit is a required part of a real- time event (for example, an auction), and no alternative to the time limit is possible; or  Essential Exception: The time limit is essential and extending it would invalidate the activity  20 Hour Exception: The time limit is longer than 20 hours.  • If the user requests more time, does the user have at least 20 seconds to acknowledge the request?		
WCAG 2.2.2	Pause, Stop, Hide: For moving, blinking, scrolling, or auto-updating information, all of the following are true: (Level A)  Moving, blinking, scrolling: For any moving, blinking or scrolling information that (1) starts automatically, (2) lasts more than five seconds, and (3) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it unless the movement, blinking, or scrolling is part of an activity where it is essential; and  Auto-updating: For any auto-updating information that (1) starts automatically and (2) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it or to control the frequency of the update unless the auto-updating is part of an activity where it is essential.  • If the application has a time out, can the user turn off the time out, modify the timeout value or request more time when the timeout happens?		

ID	Criteria	Supporting Features	Remarks and explanations
	<ul> <li>If the text movement is not essential to understanding the content, can the user pause, stop or hide the movement?</li> <li>If the text is auto updating, can the user pause stop or hide the auto update or control the frequency of the update?</li> </ul>		
WCAG 2.3.1	<ul> <li>Three Flashes or Below Threshold: Web pages do not contain anything that flashes more than three times in any one second period, or the flash is below the general flash and red flash thresholds. (Level A)</li> <li>Does any component on the screen flash for more than three times per second?</li> </ul>		
WCAG 2.4.1	<ul> <li>Bypass Blocks: A mechanism is available to bypass blocks of content that are repeated on multiple Web pages. (Level A)</li> <li>Does the application have a method for skipping content that is repeated across multiple web pages in the application?</li> </ul>		
WCAG 2.4.2	<ul> <li>Webpages have titles that describe topic or purpose. (Level A)</li> <li>Does the web page have a descriptive title that can be read by assistive technology?</li> <li>If the web page is a document or web application, does the page have a title that sufficiently describes its purpose?</li> </ul>		
WCAG 2.4.3	Focus Order: If a Web page can be navigated sequentially and the navigation sequences affect meaning or operation, focusable components receive focus in an order that preserves meaning and operability. (Level A)  Is every focusable component on the page in the order that follows a logical sequence?		
WCAG 2.4.4	Purpose (In Context): The purpose of each link can be determined from the link text alone or from the link text together with its programmatically determined link context, except where the purpose of the link would be ambiguous to users in general. (Level A)  Is the purpose of the link understandable from the link text alone or from the link text along with its programmatically determinable link text?		
WCAG 2.4.5	Multiple Ways: More than one way is available to locate a Web page within a set of Web pages except where the Web Page is the result of, or a step in, a process. (Level AA)  • Add acceptance criteria question here		
WCAG 2.4.6	Headings and Labels: Headings and labels describe topic or purpose (Level AA)		

ID	Criteria	Supporting Features	Remarks and explanations
	<ul> <li>Does the page have sufficient descriptive headings to allow easy navigation?</li> <li>Does each interactive component have sufficient programmatically discernable descriptive text to identify the component?</li> </ul>		
WCAG 2.4.7	Focus Visible: Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible. (Level AA)  • Does each user interface element have a visible focus?		
WCAG 3.1.1	<ul> <li>Language of Page: The default human language of each Web page can be programmatically determined. (Level A)</li> <li>Is the default human language of the document programmatically discernable?</li> </ul>		
WCAG 3.1.2	Language of Parts: The human language of each passage or phrase in the content can be programmatically determined except for proper names, technical terms, words of indeterminate language, and words or phrases that have become part of the vernacular of the immediately surrounding text. (Level AA)  Is any language in the document that is different from the default language of the document programmatically discernable?		
WCAG 3.2.1	<ul> <li>On Focus: When any component receives focus, it does not initiate a change of context. (Level A)</li> <li>Is the context of the document changed when a component receives focus?</li> </ul>		
WCAG 3.2.2	<ul> <li>On Input: Changing the setting of any user interface component does not automatically cause a change of context unless the user has been advised of the behavior before using the component. (Level A)</li> <li>Is the context of the document changed when a setting is changed on a component?</li> <li>Does only one element at a time receive focus?</li> <li>Are you able to discern what element you are on when you enter an input field?</li> </ul>		
WCAG 3.2.3	Consistent Navigation: Navigational mechanisms that are repeated on multiple Web pages within a set of Web pages occur in the same relative order each time they are repeated, unless a change is initiated by the user. (Level AA)  If the application use a navigational technique on multiple web pages, is the navigational technique consistent and in the same relative order on each page?		

ID	Criteria	Supporting Features	Remarks and explanations
WCAG 3.2.4	<ul> <li>Consistent Identification: Components that have the same functionality within a set of Web pages are identified consistently. (Level AA)</li> <li>Are components with the same functionality consistently identified?</li> <li>Is the alternative text for non-text elements with the same functionality consistently identified?</li> </ul>		
WCAG 3.3.1	<ul> <li>If an input error is automatically detected, the item that is in error is identified and the error is described to the user in text. (Level A)</li> <li>Add acceptance criteria question here When an error occurs while entering data into a component is the error read by the screen reader?</li> <li>When an error occurs when submitting a form, is the focus placed on the error information when the form is reloaded?</li> </ul>		
WCAG 3.3.2	<ul> <li>Labels or Instructions: Labels or instructions are provided when content requires user input. (Level A)</li> <li>Are required fields clearly identified to the assistive technology?</li> <li>Are examples provided of expected data formats to ensure information is entered correctly?</li> <li>Are field labels in close proximity to the associated fields?</li> <li>Is the label spoken by screen readers when the field receives focus?</li> <li>Is each label on the page unique?</li> </ul>		
WCAG 3.3.3	<ul> <li>Error Suggestion: If an input error is automatically detected and suggestions for correction are known, then the suggestions are provided to the user, unless it would jeopardize the security or purpose of the content. (Level AA)</li> <li>Is the user given suggestions on what to do to fix an input error when an input error occurs?</li> </ul>		
WCAG 3.3.4	Error Prevention (Legal, Financial, Data): For Web pages that cause legal commitments or financial transactions for the user to occur, that modify or delete user-controllable data in data storage systems, or that submit user test responses, at least one of the following is true: (Level AA)  1. Reversible: Submissions are reversible. 2. Checked: Data entered by the user is checked for input errors and the user is provided an opportunity to correct them. 3. Confirmed: A mechanism is available for reviewing, confirming, and correcting		

ID	Criteria	Supporting Features	Remarks and explanations
	<ul> <li>information before finalizing the submission.</li> <li>If the page is submitting information that causes a legal or financial transaction, or modifies or deletes user controllable data, or submits user test responses is at least one of the following true?         <ul> <li>The submission is reversible,</li> <li>Data entered by the user is checked for input errors and the user is provided an opportunity to correct them or</li> <li>A mechanism is available for reviewing, confirming and correcting information before finalizing the submission.</li> </ul> </li> </ul>		
WCAG 4.1.1	Parsing: In content implemented using markup languages, elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique, except where the specifications allow these features. (Level A)  • Is the markup language properly structured?		
WCAG 4.1.2	Name, Role, Value: For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies. (Level A)  • Is the name, role and value of each user interface component programmatically determinable?		

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## **Criteria Checklist: Functional Performance**

This checklist is for Chapter 3 of the final rule. When internal reference number are used (i.e. 301.1) the reference numbers refer to the specific paragraph in the final rule 301.1 (Chapter 3 Section 301 subsection 1). External reference numbers are contained in Chapter 7: Reference Standards of the final rule. The final rule is located at: https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/text-of-the-standards-and-guidelines#E102-referenced-standards.

#### \* For details on the criteria listed below, see:

https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/text-of-the-standards-and-guidelines#301-general

ID	Criteria	Supporting Features	Remarks and explanations
302.1	<ul> <li>Without Vision. Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that does not require user vision.</li> <li>Is there at least one mode of input/output operation accessible to a blind person for each feature in the program?</li> <li>If the mode of operation for the blind user to access the feature is non-standard, is the mode of operation well documented?</li> </ul>		
302.2	<ul> <li>With Limited Vision. Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited vision.</li> <li>Is there at least one mode of input/output operation accessible to a user with limited vision for each feature in the program?</li> <li>If the mode of operation for the user with limited vision to access the feature is non-standard, is the mode of operation well documented?</li> </ul>		
302.3	<ul> <li>Without Perception of Color. Where a visual mode of operation is provided, ICT shall provide at least one visual mode of operation that does not require user perception of color.</li> <li>Is there at least one mode of operation accessible to a user who cannot perceive color for each feature in the program?</li> <li>If the mode of operation for a user who cannot perceive color to access the feature is non-standard, is the mode of operation well documented?</li> </ul>		
302.4	<ul> <li>Without Hearing. Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that does not require user hearing.</li> <li>Is there at least one mode of non-auditory operation accessible to a user who cannot hear for each feature in the program?</li> </ul>		

ID	Criteria	Supporting Features	Remarks and explanations
	<ul> <li>If the mode of operation for a user who cannot hear to access the feature is non-standard, is the mode of operation well documented?</li> </ul>		
302.5	<ul> <li>With Limited Hearing. Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited hearing.</li> <li>Is there at least one non-auditory mode of operation accessible to a user with limited hearing for each feature in the program?</li> <li>If the mode of operation for the user with limited hearing to access the feature is non-standard, is the mode of operation well documented?</li> </ul>		
302.6	<ul> <li>Without Speech. Where speech is used for input, control, or operation, ICT shall provide at least one mode of operation that does not require user speech.</li> <li>Is there at least one mode of operation accessible to a user who cannot speak for each feature in the program?</li> <li>If the mode of operation for a user who seeks to access the feature is nonstandard, is the mode of operation well documented?</li> </ul>		
302.7	<ul> <li>With Limited Manipulation. Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that does not require fine motor control or simultaneous manual operations.</li> <li>Are all features of the application keyboard accessible?</li> <li>When supported by the operating system, are all features of the product or service available to users of AT that provide voice control and input?</li> </ul>		
302.8	With Limited Reach and Strength. Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that is operable with limited reach and limited strength.  If you are creating a hardware device as part of this project, are all features of the application accessible to a user with limited reach and strength?		
302.9	With Limited Language, Cognitive, and Learning Abilities. ICT shall provide features making its use by individuals with limited cognitive, language, and learning abilities simpler and easier.  • Are all features of the application accessible to a user with limited learning abilities?		

ID	Criteria	Supporting Features	Remarks and explanations
	<ul> <li>Are all features of the application easily reachable on and around the keyboard so a user with limited reach could also use it?</li> <li>Does the application in general have a gradual learning curve for users with limited cognitive abilities?</li> </ul>		

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## Criteria Checklist: Platform Hardware

This checklist is for Chapter 4 of the final rule. When internal reference number are used (i.e. 402.2) the reference numbers refer to the specific paragraph in the final rule 401.1 (Chapter 4 Section 402 subsection 2). External reference numbers are contained in Chapter 7: Reference Standards of the final rule. The final rule is located at: https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule

**EXCEPTION**: Hardware that is assistive technology shall not be required to conform to the requirements of this chapter.

**General**. ICT with closed functionality shall be operable without requiring the user to attach or install assistive technology other than personal headsets or other audio couplers, and shall conform to Section 508, Chapter 4, 402.

**Speech-Output Enabled, General**. ICT with a display screen shall be speech-output enabled for full and independent use by individuals with vision impairments.

#### **EXCEPTIONS:**

Variable message signs conforming to Section 508, Chapter 4, 402.5 shall not be required to be speech-output enabled.

Speech output shall not be required where ICT display screens only provide status indicators and those indicators conform to Section 508, Chapter 4, 409.

Where speech output cannot be supported due to constraints in available memory or processor capability, ICT shall be permitted to conform to Section 508, Chapter 4, 409 in lieu of 402.2.

Audible tones shall be permitted instead of speech output where the content of user input is not displayed as entered for security purposes, including, but not limited to, asterisks representing personal identification numbers.

Speech output shall not be required for: the machine location; date and time of transaction; customer account number; and the machine identifier or label.

Speech output shall not be required for advertisements and other similar information unless they convey information that can be used for the transaction being conducted.

#### \* For details on the criteria listed below, see:

https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/text-of-the-standards-and-guidelines#401-general

ID	Criteria	Supporting Features	Remarks and explanations
402.2.1	Information Displayed On-Screen. Speech output shall be provided for all information displayed on-screen.  Is text being displayed on-screen?  Is the on-screen text also being broadcast through speech-output enabled hardware?		
402.2.2	Transactional Outputs. Where transactional outputs are provided, the speech output shall audibly provide all information necessary to verify a transaction.  • Is speech output being used to convey		

ID	Criteria	Supporting Features	Remarks and explanations
	<ul> <li>transactional information?</li> <li>Does all transactional information displayed on the screen have the ability to be provided through speech output?</li> </ul>		
402.2.3	Speech Delivery Type and Coordination. Speech output shall be delivered through a mechanism that is readily available to all users, including, but not limited to, an industry standard connector or a telephone handset. Speech shall be recorded or digitized human, or synthesized. Speech output shall be coordinated with information displayed on the screen • Does the user have the ability to connect to the audio information via an industry standard connector? • If sound is used, is it coordinated with information displayed on the screen? • If speech output is used, is the voice recorded or digitized human or synthesized?		
402.2.4	<ul> <li>User Control. Speech output for any single function shall be automatically interrupted when a transaction is selected. Speech output shall be capable of being repeated and paused.</li> <li>Is speech output automatically interrupted when a transaction is selected?</li> <li>Does the user have the ability to pause the speech output?</li> <li>Does the user have the ability to replay the speech output?</li> </ul>		
402.2.5	Braille Instructions. Where speech output is required by Section 508, Chapter 4, 402.2, braille instructions for initiating the speech mode of operation shall be provided. Braille shall be contracted and shall conform to 36 CFR part 1191, Appendix D, Section 703.3.1.  EXCEPTION: Devices for personal use shall not be required to conform to Section 508, Chapter 4, 402.2.5.  Is speech output required by Section 508, Chapter 4, 402.2?  Do any of the exceptions not apply?  Are braille instructions provided on how to initiate speech mode of operation?  If braille is uncontracted does it conform to 36 CFR part 1191, Appendix D, Section		

ID	Criteria	Supporting Features	Remarks and explanations
	703.3.1?		
402.3.1	Private Listening. Where ICT provides private listening, it shall provide a mode of operation for controlling the volume. Where ICT delivers output by an audio transducer typically held up to the ear, a means for effective magnetic wireless coupling to hearing technologies shall be provided.  Is private listening provided?  Does private listening provide a method to control the volume?		
402.3.2	Non-private Listening. Where ICT provides non-private listening, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. A function shall be provided to automatically reset the volume to the default level after every use.  • Does the ICT provide non-private listening? • Is the volume controllable up to at least 65 dB?		
402.4	Characters on Display Screens. At least one mode of characters displayed on the screen shall be in a sans serif font. Where ICT does not provide a screen enlargement feature, characters shall be 3/16 inch (4.8 mm) high minimum based on the uppercase letter "I". Characters shall contrast with their background with either light characters on a dark background or dark characters on a light background.  Is at least one mode of characters displayed in a sans serif font?  If the ICT does not provide a screen enlargement feature, are the characters displayed on the screen at least 3/16"?  Is the contrast sufficient enough that allows a user to distinguish the letters on the background?		
402.5	Characters on Variable Message Signs. Characters on variable message signs shall conform to section 703.7 Variable Message Signs of ICC A117.1- 2009 (incorporated by reference, see 702.6.1).  Is the information displayed on the sign large enough to read?  Does the sign flicker at an unhealthy rate, e.g. more than three flashes per second?  Can the user pause the scrolling, moving,		

ID	Criteria	Supporting Features	Remarks and explanations
	or blinking content? • Is there information on the sign conveyed through color only?		
403.1	<ul> <li>General. Where provided, biometrics shall not be the only means for user identification or control.</li> <li>EXCEPTION: Where at least two biometric options that use different biological characteristics are provided, ICT shall be permitted to use biometrics as the only means for user identification or control.</li> <li>Are biometrics required to log into the equipment?</li> <li>Are there at least two options of biometric authentication using different biological characteristics present?</li> <li>If there is only one biometric authentication provided is there another method to access the equipment?</li> </ul>		
404.1	<ul> <li>General. ICT that transmits or converts information or communication shall not remove non-proprietary information provided for accessibility or shall restore it upon delivery.</li> <li>Does the ICT transmit or convert information or communication?</li> <li>Does the ICT remove non-propriety information provided for accessibility?</li> <li>Does the ICT remove and not restore non-propriety information provided for accessibility?</li> </ul>		
405.1	<ul> <li>General. The same degree of privacy of input and output shall be provided to all individuals. When speech output required by 402.2 is enabled, the screen shall not blank automatically.</li> <li>Does the screen blank when speech output is enabled?</li> </ul>		
406.1	<ul> <li>General. Where data connections used for input and output are provided, at least one of each type of connection shall conform to industry standard non- proprietary formats</li> <li>Does the equipment use data connections?</li> <li>Is there at least one of each type of connection that conforms to industry standard non-proprietary formats?</li> </ul>		
407.2	Contrast. Where provided, keys and controls shall contrast visually from background surfaces. Characters and symbols shall		

ID	Criteria	Supporting Features	Remarks and explanations
	contrast visually from background surfaces with either light characters or symbols on a dark background or dark characters or symbols on a light background.  • Are there keyboard keys or controls being used?  • Do the keyboard keys or controls contrast with the background?  • Do the keyboard keys or controls have either light characters or symbols on a dark background or do they have dark characters or symbols on a light background?		
407.3.1	<ul> <li>Tactilely Discernible. Input controls shall be operable by touch and tactilely discernible without activation.</li> <li>Does the equipment have input controls?</li> <li>Do the input controls provide tactilely different feel so the user understands them?</li> <li>Does the user have a way of determining where certain keys are located so as to know the rest of the input control layout?</li> <li>Can the user discern the tactile controls without activating them?</li> </ul>		
407.3.2	<ul> <li>Alphabetic Keys. Where provided, individual alphabetic keys shall be arranged in a QWERTY-based keyboard layout and the "F" and "J" keys shall be tactilely distinct from the other keys.</li> <li>Are the keys laid out in a QWERTY format?</li> <li>Are the "F" and "J" keys tactilely distinct from the other keys?</li> </ul>		
407.3.3	Numeric Keys. Where provided, numeric keys shall be arranged in a 12-key ascending or descending keypad layout. The number five key shall be tactilely distinct from the other keys. Where the ICT provides an alphabetic overlay on numeric keys, the relationships between letters and digits shall conform to ITU-T Recommendation E.161 (incorporated by reference, see 702.7.1).  Is the number five key tactilely distinct from the other number keys?  Does the keyboard use an alphabetic overlay on the number keys?  Do the alphabetic overlay keys conform to ITU-T Recommendation E.161?		
407.4	Key Repeat. Where a keyboard with key repeat is provided, the delay before the key repeat feature is activated shall be		

ID	Criteria	Supporting Features	Remarks and explanations
	<ul> <li>fixed at, or adjustable to, 2 seconds minimum.</li> <li>Is there a keyboard with key repeat provided?</li> <li>Is the key repeat delay adjustable to 2 seconds minimum?</li> </ul>		
407.5	Timed Response. Where a timed response is required, the user shall be alerted visually, as well as by touch or sound, and shall be given the opportunity to indicate that more time is needed.  • Did the application time out without notification?  • Did the timeout notification whether visually, sensory, or audibly display for less than 20 seconds?  • Does the application provide a method to request more time?		
407.6	<ul> <li>Operation. At least one mode of operation shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds (22.2 N) maximum.</li> <li>Can the equipment be operated with only one hand?</li> <li>Does the equipment allow for operation without tight grasping, pinching, or twisting of the wrist?</li> <li>Does the equipment allow for operation without requiring more than 5 pounds of force?</li> </ul>		
407.7	Tickets, Fare Cards, and Keycards. Where tickets, fare cards, or keycards are provided, they shall have an orientation that is tactilely discernible if orientation is important to further use of the ticket, fare card, or keycard.  • Is the orientation of the fare card, keycard, or ticket important for the use of that item?  • Does fare card, keycard, or ticket have a tactilely discernable method of the cards orientation?		
407.8	Reach Height and Depth. At least one of each type of operable part of stationary ICT shall be at a height conforming to 407.8.2 or 407.8.3 according to its position established by the vertical reference plane specified in Section 508, Chapter 4, 407.8.1 for a side reach or a forward reach. Operable parts used with speech output required by 402.2 shall not		

ID	Criteria	Supporting Features	Remarks and explanations
	<ul> <li>be the only type of operable part conforming with 407.8 unless that part is the only operable part of its type.</li> <li>Does the equipment have operable parts?</li> <li>Does the equipment require a forward reach or a side reach?</li> <li>Are there only operable parts used with speech output?</li> <li>Is there more than one operable part used with speech output?</li> <li>Is at least one of each type of operable part of stationary Information Communications Technology, ICT, shall be at a height conforming to 407.8.2 or 407.8.3?</li> </ul>		
407.8.1	<ul> <li>Vertical Reference Plane. Operable parts shall be positioned for a side reach or a forward reach determined with respect to a vertical reference plane. The vertical reference plane shall be located in conformance to Section 508, Chapter 4, 407.8.2 or 407.8.3.</li> <li>Does the equipment have operable parts?</li> <li>Does the equipment require a forward reach or a side reach?</li> <li>Is the equipment conformant with Section 508, Chapter 4, 407.8.2 or 407.8.3?</li> </ul>		
407.8.1.1	<ul> <li>Vertical Plane for Side Reach. Where a side reach is provided, the vertical reference plane shall be 48 inches (1220 mm) long minimum.</li> <li>Does the equipment have user controls?</li> <li>Are the user controls within a 48 inch vertical plane?</li> </ul>		
407.8.1.2	Vertical Plane for Forward Reach. Where a forward reach is provided, the vertical reference plane shall be 30 inches (760 mm) long minimum.  In order to operate the equipment is a forward reach required?  Is the forward reach in the vertical plane 30 inches or less?		
407.8.2	Side Reach. Operable parts of ICT providing a side reach shall conform to Section 508, Chapter 4, 407.8.2.1 or 407.8.2.2. The vertical reference plane shall be centered on the operable part and placed at the leading edge of the maximum protrusion of the ICT within the length of the vertical reference plane. Where a side reach requires a reach over a portion of the ICT, the height of that portion of the ICT shall be 34 inches (865 mm) maximum.		

ID	Criteria	Supporting Features	Remarks and explanations
	<ul> <li>Is a side reach required to operate the equipment?</li> <li>Does the required reach required to operate the equipment 34 inches or less?</li> </ul>		
407.8.2.1	<ul> <li>Unobstructed Side Reach. Where the operable part is located 10 inches (255 mm) or less beyond the vertical reference plane, the operable part shall be 48 inches (1220 mm) high maximum and 15 inches (380 mm) high minimum above the floor.</li> <li>Are there operable parts of the ICT?</li> <li>Are the operable parts of the ICT located 10 inches or less beyond the vertical reference plane?</li> <li>Is the operable part a maximum of 48 inches and a minimum of 15 inches above the floor?</li> </ul>		
407.8.2.2	Obstructed Side Reach. Where the operable part is located beyond the leading edge of the maximum protrusion within the length of the vertical reference plane, the operable part shall conform to Section 508, Chapter 4, 407.8.3.2. The maximum allowable forward reach operable part shall be 25 inches (635 mm).  • Are there operable parts of the ICT?  • Are the operable parts of the ICT located more than 10 inches but not more than 24 inches beyond the vertical reference plane?  • Is the operable part a maximum of 46 inches and a minimum of 15 inches above the floor?  • Is the operable part of the ICT located more than 24 inches beyond the vertical reference plane?		
407.8.3	Forward Reach. Operable parts of ICT providing a forward reach shall conform to Section 508, Chapter 4, 407.8.3.1 or 407.8.3.2. The vertical reference plane shall be centered, and intersect with, the operable part. Where a forward reach allows a reach over a portion of the ICT, the height of that portion of the ICT shall be 34 inches (865 mm) maximum.  • Are there operable parts of the ICT?  • Are the operable parts of the ICT centered with the vertical reference plane?  • Is the operable part a maximum of 34 inches high?		
407.8.3.1	Unobstructed Forward Reach. Where the		

ID	Criteria	Supporting Features	Remarks and explanations
	operable part is located at the leading edge of the maximum protrusion within the length of the vertical reference plane of the ICT, the operable part shall be 48 inches (1220 mm) high maximum and 15 inches (380 mm) high minimum above the floor.  • Are there operable parts of the ICT?  • Are the operable parts of the ICT located at the leading edge of the vertical reference plane?  • Is the operable part a maximum of 48 inches and a minimum of 15 inches above the floor?		
407.8.3.2	Obstructed Forward Reach. Where the operable part is located beyond the leading edge of the maximum protrusion within the length of the vertical reference plane, the operable part shall conform to Section 508, Chapter 4, 407.8.3.2. The maximum allowable forward reach to an operable part shall be 25 inches (635 mm).  • Are there operable parts of the ICT?  • Are the operable parts of the ICT located beyond the leading edge of the vertical reference plane?  • Is the maximum allowable forward reach to an operable part 25 inches?		
407.8.3.2.1	Operable Part Height for ICT with Obstructed Forward Reach. The height of the operable part shall conform to Table 407.8.3.2.1. Reach Depth: Less than 20 inches (510 mm) Operable Part Height: (1220 mm) maximum Reach Depth: 20 inches (510 mm) to 25 inches (635 mm); Operable Part Height: 44 inches (1120 mm) maximum  • Are there operable parts of the ICT? • Does the ICT conform to Table 407.8.3.2.1?		
407.8.3.2.2	Knee and Toe Space under ICT with Obstructed Forward Reach. Knee and toe space under ICT shall be 27 inches (685 mm) high minimum, 25 inches (635 mm) deep maximum, and 30 inches (760 mm) wide minimum and shall be clear of obstructions.  EXCEPTIONS:  1. Toe space shall be permitted to provide a clear height of 9 inches (230 mm) minimum above the floor and a clear depth of 6 inches (150 mm) maximum from the vertical reference plane toward the leading		

ID	Criteria	Supporting Features	Remarks and explanations
	edge of the ICT.  2. At a depth of 6 inches (150 mm) maximum from the vertical reference plane toward the leading edge of the ICT, space between 9 inches (230 mm) and 27 inches (685 mm) minimum above the floor shall be permitted to reduce at a rate of 1 inch (25 mm) in depth for every 6 inches (150 mm) in height.		
408.2	Visibility. Where stationary ICT provides one or more display screens, at least one of each type of display screen shall be visible from a point located 40 inches (1015 mm) above the floor space where the display screen is viewed.  • Is there more than one display?  • Is at least one display at least 40 inches above the floor?		
408.3	Flashing. Where ICT emits lights in flashes, there shall be no more than three flashes in any one-second period.  EXCEPTION: Flashes that do not exceed the general flash and red flash thresholds defined in WCAG 2.0 (incorporated by reference, see 702.10.1) are not required to conform to 408.3.  Is flashing displayed on the ICT?  Are there more than three flashes in any one-second period?		
412.2.1	<ul> <li>Volume Gain for Wireline Telephones.</li> <li>Volume gain conforming to 47 CFR 68.317 shall be provided on analog and digital wireline telephones.</li> <li>Are there analog or digital wireline telephones?</li> <li>Do the analog or wireline telephones have volume gain?</li> <li>Does the volume gain conform to 47 CGF 68.317?</li> </ul>		
412.2.2	Volume Gain for Non-Wireline ICT. A method for increasing volume shall be provided for non-wireline ICT.  • Does the ICT include non-wireline?  • Is there a method to increase/decrease volume provided?		
412.3	Interference Reduction and Magnetic Coupling. Where ICT delivers output by a handset or other type of audio transducer that is typically held up to the ear, ICT shall reduce interference with hearing		

ID	Criteria	Supporting Features	Remarks and explanations
	technologies and provide a means for effective magnetic wireless coupling in conformance with 412.3.1 or 412.3.2.  • Does the ICT deliver output via handset or other type of transducer?  • Is the handset or transducer held up to the ear?  • Does the ICT reduce interference with hearing technologies?  • Does the ICT allow for magnetic coupling in conformance with 412.3.1 or 412.3.2?		
412.3.1	Wireless Handsets. ICT in the form of wireless handsets shall conform to ANSI/IEEE C63.19-2011 (incorporated by reference, see 702.5.1).  Is there a wireless handset?  Does the handset conform to ANSI/IEEE C63.19- 2011?		
412.3.2	Wireline Handsets. ICT in the form of wireline handsets, including cordless handsets, shall conform to TIA-1083-B (incorporated by reference, see 702.9.1).  Is there a wireline handset?  Does the wireline handset conform to TIA-1083-B?		
412.4	Digital Encoding of Speech. ICT in IP-based networks shall transmit and receive speech that is digitally encoded in the manner specified by ITU-T Recommendation G.722.2 (incorporated by reference, see 702.7.2) or IETF RFC 6716 (incorporated by reference, see 702.8.1).  • Does the ICT in IP-based networks transmit and receive speech?  • Is the digital encoding of speech encoded in the manner specified by ITU-T Recommendation G.722.2 or IETF RFC 6716?		
412.6	<ul> <li>Caller ID. Where provided, caller identification and similar telecommunications functions shall be visible and audible.</li> <li>Does the equipment provide caller ID information visually?</li> <li>Does the equipment provide caller ID information audibly?</li> </ul>		
412.7	Video Communication. Where ICT provides real-time video functionality, the quality of the video shall be sufficient to support communication using sign language.		

ID	Criteria	Supporting Features	Remarks and explanations
	<ul> <li>Does the ICT provide real-time video?</li> <li>Does the ICT provide quality video so as to be able to see sign language?</li> </ul>		
413.1.1	<ul> <li>Decoding and Display of Closed</li> <li>Captions. Players and displays shall decode closed caption data and support display of captions.</li> <li>Does the players and display provide for closed captions?</li> <li>Does the equipment support display of closed captions?</li> <li>Is the equipment capable of decoding closed captions?</li> </ul>		
413.1.2	Pass-Through of Closed Caption Data. Cabling and ancillary equipment shall pass through caption data.  Is closed captioning provided? Does the cabling and ancillary allow closed captioning?		
414.1.1	Digital Television Tuners. Digital television tuners shall provide audio description processing that conforms to ATSC A/53 Digital Television Standard, Part 5 (2014) (incorporated by reference, see 702.2.1). Digital television tuners shall provide processing of audio description when encoded as a Visually Impaired (VI) associated audio service that is provided as a complete program mix containing audio description according to the ATSC A/53 standard.  • Are there audio descriptions included with the Digital Television Tuners?  • Are the audio descriptions controllable?  • Do the audio descriptions conform to ATSC A/53 standard?		
414.1.2	Other ICT. ICT other than digital television tuners shall provide audio description processing.  Does the ICT provide audio description processing?  Is audio description able to be controlled via keyboard only commands?  Does audio description display visually as well as audible?		
415.1.1	Caption Controls. Where ICT provides operable parts for volume control, ICT shall also provide operable parts for caption selection.  • Does the application provide volume control?		

ID	Criteria	Supporting Features	Remarks and explanations
	<ul> <li>Is there a method to control the caption selection?</li> </ul>		
415.1.2	<ul> <li>Audio Description Controls. Where ICT provides operable parts for program selection, ICT shall also provide operable parts for the selection of audio description.</li> <li>Are there operable parts for program selection?</li> <li>Is there a way of controlling these operable parts via keyboard only?</li> <li>Does the program provide audio description for operable parts for the selection of audio description?</li> </ul>		

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## **Criteria Checklist: Platform Software**

This checklist is for Chapter 5 Section 501 of the final rule. When internal reference numbers are used (i.e. 501.1) the reference numbers refer to the specific paragraph in the final rule 501.1 (Chapter 5 Section 501 subsection 1). External reference numbers are contained in Chapter 7: Reference Standards of the final rule. The final rule is located at:

https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule

**Scope**. The requirements of Section 508, Chapter 5 shall apply to software where required by Section 508, Chapter 2 (Scoping Requirements), Section 255 of the Communications Act, Chapter 2 (Scoping Requirements), and where otherwise referenced in any other chapter of the Revised 508 Standards or Revised 255 Guidelines.

**EXCEPTION**: Where Web applications do not have access to platform accessibility services and do not include components that have access to platform accessibility services, they shall not be required to conform to Section 508, Chapter 5, 502 or 503 provided that they conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1).

#### \* For details on the criteria listed below, see:

https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/text-of-the-standards-and-guidelines#501-general

ID	Criteria	Supporting Features	Remarks and explanations
502.2.1	User Control of Accessibility Features. Platform software shall provide user control over platform features that are defined in the platform documentation as accessibility features. Is there at least one mode of input/output operation accessible to a blind person for each feature in the program?  • Are the accessibility features of the platform software available to the user to control?		
502.2.2	No Disruption of Accessibility Features. Software shall not disrupt platform features that are defined in the platform documentation as accessibility features. Is there at least one mode of input/output operation accessible to a user with limited vision for each feature in the program?  • Does the software platform avoid disrupting the underlying platforms accessibility features?		
502.3.1	Object Information. The object role, state(s), properties, boundary, name, and description shall be programmatically determinable.  Can the assistive technology software discern the object information exposed by the software running on the platform?		
502.3.2	<ul> <li>Modification of Object Information. States and properties that can be set by the user shall be capable of being set programmatically, including through assistive technology</li> <li>Can the assistive technology user set the object value correctly?</li> </ul>		
502.3.3	Row, Column, and Headers. If an object is in a data		

	<ul> <li>table, the occupied rows and columns, and any headers associated with those rows or columns, shall be programmatically determinable.</li> <li>Can the assistive technology software discern the row and column header information exposed by the software running on the platform?</li> </ul>	
502.3.4	<ul> <li>Values. Any current value(s), and any set or range of allowable values associated with an object, shall be programmatically determinable.</li> <li>Can the assistive technology software discern the value and range of value information exposed by the software running on the platform?</li> </ul>	
502.3.5	<ul> <li>Modification of Values. Values that can be set by the user shall be capable of being set programmatically, including through assistive technology. Are all features of the application keyboard accessible?</li> <li>Can the assistive technology user set the value correctly?</li> </ul>	
502.3.6	<ul> <li>Label Relationships. Any relationship that a component has as a label for another component, or of being labeled by another component, shall be programmatically determinable.</li> <li>Can the assistive technology software discern the label of the component when the focus in on the component?</li> </ul>	
502.3.7	<ul> <li>Hierarchical Relationships. Any hierarchical (parent-child) relationship that a component has as a container for, or being contained by, another component shall be programmatically determinable. Are all features of the application accessible to a user with limited learning abilities?</li> <li>Can the assistive technology software discern the hierarchical relationship of the components when the focus is on the component?</li> </ul>	
502.3.9	<ul> <li>Modification of Text. Text that can be set by the user shall be capable of being set programmatically, including through assistive technology.</li> <li>Can the assistive technology user set the text correctly for an object that allows non-AT user to set the text value without using a mouse?</li> </ul>	
502.3.10	<ul> <li>List of Actions. A list of all actions that can be executed on an object shall be programmatically determinable.</li> <li>Can the assistive technology software discern the actions available on the component when the focus is on the component?</li> </ul>	
502.3.11	<ul> <li>Actions on Objects. Applications shall allow assistive technology to programmatically execute available actions on objects.</li> <li>Can the assistive technology user execute the actions on the drop down box correctly?</li> </ul>	
502.3.12	Focus Cursor. Applications shall expose information	

	<ul> <li>and mechanisms necessary to track focus, text insertion point, and selection attributes of user interface components.</li> <li>Can the assistive technology see the visible focus as the user uses the keyboard only and TABS through the application?</li> <li>Can the assistive technology user see a visible indicator when focus is on a field that accepts text input?</li> <li>Are there no hidden areas that gain focus?</li> </ul>	
502.3.13	Modification of Focus Cursor. Focus, text insertion point, and selection attributes that can be set by the user shall be capable of being set programmatically, including through the use of assistive technology.  Can the assistive technology user see the focus and text insertion points?	
502.3.14	<ul> <li>Event Notification. Notification of events relevant to user interactions, including but not limited to, changes in the component's state(s), value, name, description, or boundary, shall be available to assistive technology.</li> <li>Are the accessibility fields of the software components running on the platform correctly captured after the notification events are sent?</li> </ul>	
502.4	Platform Accessibility Features. Platforms and platform software shall conform to the requirements in ANSI/HFES 200.2, Human Factors Engineering of Software User Interfaces — Part 2: Accessibility (2008) (incorporated by reference, see 702.4.1) listed below:  • Section 9.3.3 Enable sequential entry of multiple (chorded) keystrokes;  • Section 9.3.4 Provide adjustment of delay before key acceptance;  • Section 9.3.5 Provide adjustment of same-key double-strike acceptance;  • Section 10.6.7 Allow users to choose visual alternative for audio output;  • Section 10.6.8 Synchronize audio equivalents for visual events;  • Section 10.6.9 Provide speech output services; and  • Section 10.7.1 Display any captions provided.	

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## **Criteria Checklist: Applications**

This checklist is for Chapter 5 Section 503 of the final rule. When internal reference number are used (i.e. 503.2) the reference numbers refer to the specific paragraph in the final rule 503.2 (Chapter 5 Section 503 subsection 2). External reference numbers are contained in Chapter 7: Reference Standards of the final rule. The final rule is located at:

https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule

**General**. Applications shall conform to Section 508, Chapter 5, 503.

#### \* For details on the criteria listed below, see:

https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/text-of-the-standards-and-guidelines#503-applications

ID	Criteria	Supporting Features	Remarks and explanations
503.2	<ul> <li>User Preferences. Applications shall permit user preferences from platform settings for color, contrast, font type, font size, and focus cursor.</li> <li>EXCEPTION: Applications that are designed to be isolated from their underlying platform software, including Web applications, shall not be required to conform to Section 508, Chapter 5, 503.2.</li> <li>When the color settings in the Windows Control Panel Display setting are modified, does the application use the new settings? Note: this requires admin rights on the machine to check.</li> <li>When the high contrast in the Windows Ease of Access Center is activated, does the application use the high contrast?</li> <li>When the user changes the font size in the Windows Control Panel Display setting, does the application use the font size selected.</li> <li>When the font cursor (Mouse Pointer) in the Windows Ease of Access Center is changed does the application use the font cursor chosen?</li> </ul>		
503.3	<ul> <li>Alternative User Interfaces. Where an application provides an alternative user interface that functions as assistive technology, the application shall use platform and other industry standard accessibility services.</li> <li>If the application provides an alternative user interface that functions as Assistive technology, does that interface use the platform accessibility services?</li> </ul>		
503.4.1	Audio Description or Media Alternative (Pre- recorded): An alternative for time-based media or audio description of the prerecorded video content is provided for synchronized media, except when the media is a media alternative for text and is clearly labeled as such. (Level A) If the application provides an alternative user interface that functions as Assistive technology, does that interface use the platform accessibility services?		
503.4.2	Captions (Live): Captions are provided for all live audio content in synchronized media. (Level AA)		

ID	Criteria	Supporting Features	Remarks and explanations
	If the video player allows for program selections does it also allow for the selection of audio descriptions at the same menu level as the volume or program selection control?		

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## **Criteria Checklist: Authoring Tools**

This checklist is for Chapter 5 Section 504 of the final rule. When internal reference number are used (i.e. 504.2) the reference numbers refer to the specific paragraph in the final rule 504.2 (Chapter 5 Section 504 subsection 2). External reference numbers are contained in Chapter 7: Reference Standards of the final rule. The final rule is located at:

https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule

**General**. Where an application is an authoring tool, the application shall conform to Section 508, Chapter 5, 504 to the extent that information required for accessibility is supported by the destination format.

#### \* For details on the criteria listed below, see:

https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/text-of-the-standards-and-guidelines#504-authoring-tools

ID	Criteria	Supporting Features	Remarks and explanations
504.2	Content Creation or Editing. Authoring tools shall provide a mode of operation to create or edit content that conforms to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1) for all supported features and, as applicable, to file formats supported by the authoring tool. Authoring tools shall permit authors the option of overriding information required for accessibility.  EXCEPTION: Authoring tools shall not be required to conform to Section 508, Chapter 5, 504.2 when used to directly edit plain text source code.  • Does the authoring tool have a methodology for creating content, which is conformant with 508 standards?		
504.2.1	Preservation of Information Provided for Accessibility in Format Conversion. Authoring tools shall, when converting content from one format to another or saving content in multiple formats, preserve the information required for accessibility to the extent that the information is supported by the destination format.  • If the authoring tool allows for content created by the tool to be saved in multiple formats, does it preserve the accessibility of the content during the conversion?		
504.2.2	PDF Export. Authoring tools capable of exporting PDF files that conform to ISO 32000-1:2008 (PDF 1.7) shall also be capable of exporting PDF files that conform to ANSI/AIIM/ISO 14289-1:2016 (PDF/UA-1) (incorporated by reference, see 702.3.1).  If the authoring tool allows for content created by the tool to be saved in PDF format, does the created PDF pass the Adobe Acrobat Pro Accessibility checker or similar accessibility checks?		
504.3	<b>Prompts</b> . Authoring tools shall provide a mode of operation that prompts authors to create content that conforms to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1) for supported features and, as applicable, to		

	file formats supported by the authoring tool  • Is there a mode of operation that prompts the user to ensure the content created meets the WCAG 2 standards?	
504.4	Templates. Where templates are provided, templates allowing content creation that conforms to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1) shall be provided for a range of template uses for supported features and, as applicable, to file formats supported by the authoring tool.  If the authoring tool provides content templates, are some of the content templates 508 conformant?	

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# **Criteria Checklist: Documentation and Support Services**

This checklist is for Chapter 6 of the final rule. When internal reference number are used (i.e. 603.1) the reference numbers refer to the specific paragraph in the final rule 603.1 (Chapter 6 Section 603 subsection 1). External reference numbers are contained in Chapter 7: Reference Standards of the final rule. The final rule is located at: https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule

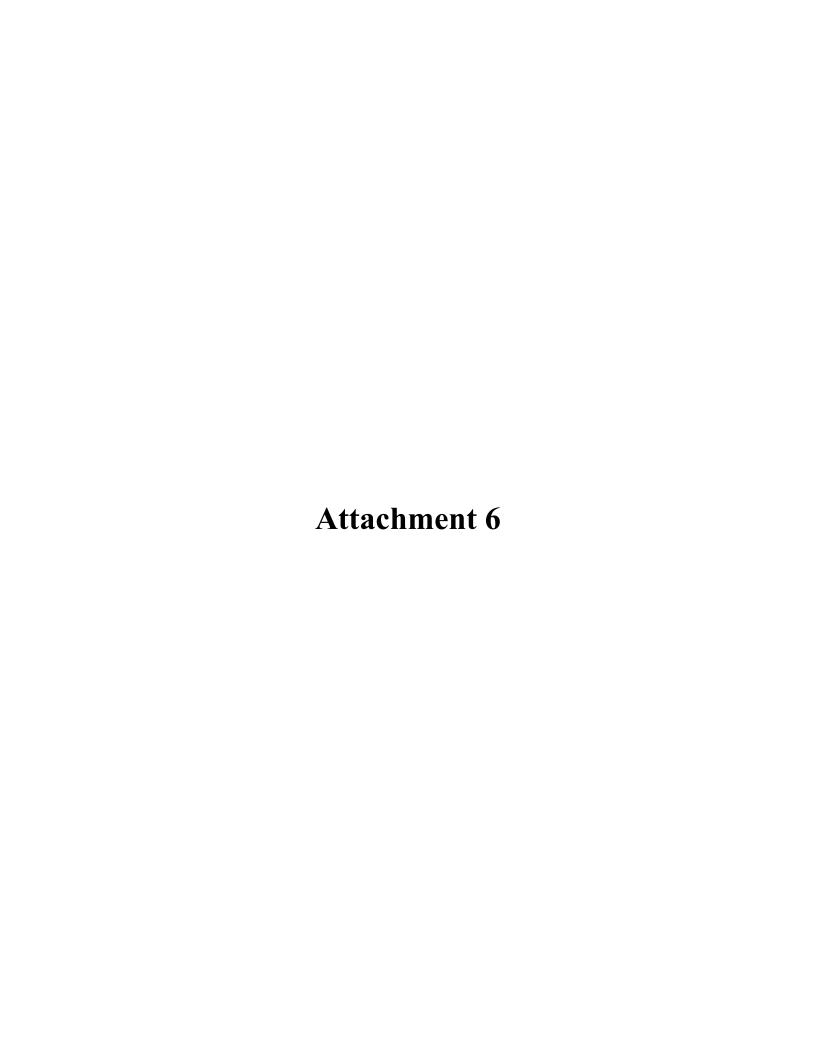
#### \* For details on the criteria listed below, see:

https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/text-of-the-standards-and-guidelines#602-support-documentation

ID	Criteria	Supporting Features	Remarks and explanations
602.2	Accessibility and Compatibility Features. Documentation shall list and explain how to use the accessibility and compatibility features required by Chapters 4 and 5.  Documentation shall include accessibility features that are built-in and accessibility features that provide compatibility with assistive technology.  If the product provides built in accessibility features, then are those features explained in the support documentation?  If the product provides hot keys to make navigation easier, are those hot keys provided in the support documentation?		
602.3	<ul> <li>Electronic Support Documentation. Documentation in electronic format, including Web-based self- service support, shall conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1).</li> <li>If the support documentation is provided as HTML Pages, then do the HTML Pages adhere to all 508 requirements as described in the WCAG sub epic and WCAG</li> <li>web only sub epic?</li> <li>If the support documentation is provided as a separate document (PDF, Word, etc.), then does the document pass the WCAG 2.0 checkpoints for documents?</li> </ul>		
602.4	Alternate Formats for Non-Electronic Support     Documentation. Where support documentation is only provided in non-electronic formats, alternate formats usable by individuals with disabilities shall be provided upon request.     If the project provides documentation only in non-electronic formats, is the process documented that describes how people with disabilities can request and be provided access to the documentation in alternative formats?		
603.2	<ul> <li>Information on Accessibility and Compatibility Features.</li> <li>ICT support services shall include information on the accessibility and compatibility features required by 602.2.</li> <li>If the project provides support services, does the support services include explanations of how to use the accessibility and compatibility features associated with the</li> </ul>		

	product?	
603.3	Accommodation of Communication Needs. Support services shall be provided directly to the user or through a referral to a point of contact. Such ICT support services shall accommodate the communication needs of individuals with disabilities.     If the project provides support services, does it allow for Interactive Voice Response (IVR) communication?     If the project provides a chat feature, Does the chat feature conform to the WCAG 2.0 checkpoints?	

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ID Title	Security Domain ID
4408765 EEO - People with Disabilities Program	13
4565676 Special Considerations in Rehabilitation for People with Severe Disabilities; M28C Topics/Updates	436
4569010 Health Care Workers and the Americans with Disabilities Act   U.S. Equal Employment Opportunity Comm	ATG
131001410 Suicide Prevention in Veterans with Disabilities_December Recording	EES
131000903 Suicide Prevention in Veterans with Disabilities	EES
19585 Mosby's Nursing Aide Curriculum: Intellectual and Developmental Disabilities: Specific Conditions	EES
19584 Mosby's Nursing Aide Curriculum: Intellectual and Developmental Disabilities: An Overview	EES
13509 Pediatrics and Disabilities (CNA In-Service Training) (Long Term Care)	EES
4560056 MEMPHIS 4700.PHYSICAL- Physical Disabilities: Applying the Law and Providing Reasonable Accommodation	MEM
4622978 Hidden Disabilities	NCHS
4571976 Supervisor Institute 301-Supervisor Town Hall - Employees with Disabilities	NOL
7009581 Supporting Workers with Disabilities	OHRA
4588835 Perfectly Able: How to Attract and Hire Talented People with Disabilities	OHRA
4582639 Hidden Talent: How Leading Companies Hire, Retain, and Benefit from People with Disabilities	OHRA
4599961 Assistive Technologies for Physical and Cognitive Disabilities	OHRA
4573606 Web Accessibility for People with Disabilities	OHRA
4604183 Disability Awareness: Working with People with Disabilities Study Guide, Student Edition	OHRA
zlchr_01_b15_aoc_enus Understanding the Americans with Disabilities Act (ADA) - Post-Assessment	OHRA
zlchr_01_a15_lcc_enus Understanding the Americans with Disabilities Act (ADA)	OHRA
zlchr_01_a15_aoc_enus Understanding the Americans with Disabilities Act (ADA) - Pre-Assessment	OHRA
4504188 Americans with Disabilities Act: An Overview for Managers	OHRA
4503236 COMPLIANCE SHORT: Accommodating Disabilities	OHRA
4618149 Psychiatry Grand Rounds: Mental Health Diagnoses and Challenging Behavior as Predictors of Social Outcomes for People v	vith Intellectual and Development Disabilities RIC
4617714 Introduction to the Genitourinary System VA Schedule for Rating Disabilities (VASRD) Updates	VBA
4617715 Introduction to the Cardiovascular System VA Schedule for Rating Disabilities (VASRD) Updates	VBA
4616637 VRE Disability Roundtable – Four Individuals with Disabilities Share Their Stories	VBA
4555586 Mental Health and Cognitive Disabilities, with focus on PTSD and general anxiety pertaining to RA	VBA
4528533 Avoidance of Under-evaluating Disabilities (RVSR)	VBA
4193041 Introduction to the Schedule for Rating Disabilities 38 CFR 4.1-4.31	VBA
4192859 Evaluating Disabilities	VBA