



Defense Finance and Accounting Service INSTRUCTION

NUMBER 8440.1-I

RELEASE DATE December 16, 2022

Information Technology (IT)/ZT

SUBJECT: DFAS Section 508 Program for Accessibility of Information and Communication Technology (ICT)

References: See Enclosure 1.

1. PURPOSE. This instruction establishes the Section 508 Program for the Defense Finance and Accounting Service (DFAS) and implements Section 794d of Title 29, United States Code (U.S.C.), also known as “Section 508 of the Rehabilitation Act of 1973;” Part 1194 of Title 36, Code of Federal Regulations (CFR); and Subpart 39.2 of the Federal Acquisition Regulation (FAR). Collectively, these authorities are referred to in this issuance as “Section 508.”
2. APPLICABILITY. This instruction applies to all DFAS personnel.
3. POLICY. It is DFAS policy that:
 - a. All ICT developed, procured, maintained, funded, and used by the agency will be accessible to persons with disabilities.
 - b. DFAS only employ the narrow exemptions in the Section 508 regulations when unavoidable.
 - c. The U.S. Access Board Section 508 standards establish the minimum levels of compliance required.
 - d. All Section 508 web-based (e.g., web pages, web sites) compliance testing shall be performed by a certified Trusted Tester.
 - e. Any ICT product or service that is developed (built) or adapted specifically for DFAS is appropriately addressed and evaluated in accordance with (IAW) DFAS 8430.01-I.

- f. To the maximum extent possible, use individuals with disabilities as testers for accessibility features related to their impairment.
 - g. The Requirements Owner (RO) shall complete a DFAS Form 1411 for all contracts, interagency agreements, and in-house development.
 - h. No person shall be subject to retaliation for opposing any practice made unlawful by the Rehabilitation Act of 1973, as amended, 29 U.S.C. 791, or for participating in any stage of administrative or judicial proceedings under the statute.
 - i. At DFAS, the DFAS Section 508 Program Manager is the component coordinator.
 - j. An inventory of all DFAS ICT shall be completed within three years of the signing of this publication. After the three years, an inventory of all ICT shall be conducted annually.
 - k. This instruction will be fully implemented for the 2023 reporting cycle.
- 4. RESPONSIBILITIES. See Enclosure 2.
 - 5. PROCEDURES. See Enclosures 3-16.
 - 6. RELEASABILITY. Unlimited. Unclassified publication cleared for public release.
 - 7. EXPIRATION DATE. This Instruction is issued 12/15/2022 and is hereby rescinded ten years from that date.

On behalf of the Director, DFAS

G. Paul Gass
Director, Information Technology

Enclosure(s)

1. References
2. Responsibilities
3. DFAS Section 508 ICT Accessibility Team Charter
4. Section 508 Analysis
5. Procurement of ICT by Contract Services Directorate (CSD)
6. Procurement of ICT through Interagency Agreements
7. ICT Life-Cycle Activities
8. Notification and Resolution of Section 508 Issues and Complaints
9. Plan of Action & Milestones (POA&M) Contents
10. Appointment of Section 508 Representatives
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ENCLOSURE 1

REFERENCES

Code of Federal Regulations, Title 36, Part 1194 (also known as “Information and Communication Technology Final Standards and Guidelines”), current edition
Code of Federal Regulations, Title 48, Chapter 1 (also known as "Federal Acquisition Regulations (FAR)"), current edition
DFAS Form 1411, “Information and Communication Technology (ICT) Requirements Checklist for Section 508 Compliance,” November 2022
DFAS Form 1412, “Appointment of Section 508 Representatives,” November 2022
DFAS Form 9037, “Agency Agreement Coordination Form,” June 2015
DFAS Instruction 1020.1, “Providing Reasonable Accommodations for Individuals with Disabilities,” June 15, 2022
DFAS Instruction 4200.2, “Government Purchase Card (GPC) Program,” January 10, 2022
DFAS Instruction 5015.2, “Records Management Procedures,” February 24, 2011, as amended
DFAS Instruction 5025.3, “Publications Program,” April 12, 2021
DFAS Instruction 8430.01, “System Life Cycle (SLC) Management,” April 20, 2016
DFAS Portal Information Technology Website, “Accessibility – Section 508”¹
DFAS Public Website²
DoD Instruction 8170.01, “Online Information Management and Electronic Messaging,” January 2, 2019, as amended
DoD Manual 8400.01, “Accessibility of Information and Communications Technology (ICT),” November 14, 2017
Office of Federal Procurement Policy Memorandum, "Revisions to the Federal Acquisition Certification Program for Program and Project Managers (FAC-P/PM)," December 16, 2013
United States Code, Title 29, Section 794d (also known as “Section 504 of the Rehabilitation Act of 1973”), current edition
World Wide Web Consortium, "Web Content Accessibility Guidelines (WCAG) 2.1," June 5, 2018

¹ <https://dfasportal.dfas.mil/it/pages/accessibility.aspx>

² <https://www.dfas.mil/>

ENCLOSURE 2

RESPONSIBILITIES

1. CHIEF INFORMATION OFFICER (CIO). Shall:
 - a. Provide DFAS Section 508 implementation oversight and ensure DFAS applies Section 508 requirements across the enterprise.
 - b. Identify and incorporate into the DFAS ICT, to the maximum extent possible, any assistive technology approved through the Reasonable Accommodation process IAW DFAS 1020.1-I.
 - c. Provide funding and qualified personnel to successfully implement and maintain a Section 508 program.
 - d. Provide enterprise tool(s) for automated Section 508 compliance testing.
2. DIRECTOR, OFFICE OF EQUAL OPPORTUNITY PROGRAMS (OEOP). Shall ensure:
 - a. Collaboration with the DFAS Section 508 Program Manager on metrics reporting and Section 508 and reasonable accommodation issues.
 - b. Participation in the Global Service Desk (GSD) Configuration Control Board (CCB) weekly meetings to ensure new or modified hardware and software is compatible with current accessibility tools for those with disabilities.
3. DIRECTOR, ENTERPRISE SERVICES. Shall ensure:
 - a. DFAS technology infrastructure complies with Section 508 Standards and technical architecture.
 - b. Review of all requests to acquire ICT for Section 508 compliance.
4. DIRECTOR, CORPORATE COMMUNICATIONS. Shall ensure both internal and external DFAS official communications transmitted electronically comply with Section 508 accessibility requirements.
5. DFAS SECTION 508 PROGRAM MANAGER. Shall:
 - a. Develop and implement standardized checklists to evaluate ICT products, services, and websites to ensure they (as well as any updates or upgrades) meet the Section 508 Accessibility Standards.
 - b. Develop and maintain a Section 508 portal page to include Frequently Asked Questions (FAQ), best practices, metric reports, inventory lists, points of contact (POC), accessibility tools, etc.

- c. Manage access to the Electronic Content and the ICT Hardware and Software inventory lists.
 - d. Keep abreast of technologies useful to individuals with disabilities, best practices of federal agencies for Section 508 compliance, and accessibility of ICT in use by other federal agencies.
 - e. Monitor Title 48, United States Code, FAR, and Defense Federal Acquisition Regulation Supplement (DFARS) regarding changes impacting Section 508.
 - f. Participate in the GSD Configuration Control Board (CCB) weekly meetings to ensure new or modified hardware and software is accessible for those with disabilities.
6. SECTION 508 REPRESENTATIVES. Shall:
- a. Advise and distribute Section 508 guidance as required for personnel who they represent.
 - b. Record and analyze common errors found during testing and verification activities.
7. PURCHASE CARD AUTHORIZING OFFICIALS. Shall review proposed purchases to ensure the purchase cardholders for whom they are responsible are complying with and incorporating Section 508 requirements in procurements.
8. PURCHASE CARD HOLDERS. Shall:
- a. Confirm the accessibility of products or services for their intended users prior to purchase IAW DFAS 4200.2-I.
 - b. Maintain relevant documents that demonstrate applicable Section 508 requirements were included in the procurement.
9. CONTENT MANAGERS. Shall ensure all DFAS information loaded to the public or private facing websites comply with Section 508 accessibility requirements.
10. TRUSTED TESTERS. Shall:
- a. Ensure all training is current to maintain Trusted Tester certification.
 - b. Maintain testing records IAW DFAS 5015.2-I.
11. TESTERS. Shall:
- a. Incorporate Section 508 compliance testing into their testing procedures.
 - b. Maintain testing records IAW DFAS 5015.2-I.
12. TRAINING PROVIDERS. Shall:

- a. Ensure that all training materials, including electronic handouts, presentations, slide productions, and other materials are compliant with the Section 508 accessibility standards.
- b. Comply with the Section 508 standards requiring captioning and audio description for training and informational multimedia productions.

13. ALL DFAS EMPLOYEES. Shall:

- a. Ensure all electronic documents and official communications created for dissemination either internally or externally comply with the Section 508 accessibility standards.
- b. Follow Section 508 guidance for procuring, installing, and use of accessible IT hardware and software products and services.
- c. Use the accessibility checkers within the Microsoft Suite and Adobe software to ensure products are Section 508 compliant.
- d. Contact their Section 508 Representative for any Section 508 issues.

ENCLOSURE 3

DFAS SECTION 508 INFORMATION AND COMMUNICATION TECHNOLOGY (ICT) ACCESSIBILITY TEAM CHARTER

1. BACKGROUND.

The DFAS Section 508 Program Manager is required to establish a Section 508 Accessibility Team per the DoDM 8400.01.

2. TEAM NAME.

The name shall be the DFAS Section 508 Information and Communication Technology (ICT) Accessibility Team (DFAS ICTAT or ICTAT).

3. MEMBERSHIP. The DFAS ICTAT is comprised of:

a. Permanent Positions.

- (1) DFAS Section 508 Program Manager.
- (2) All Section 508 Representatives.
- (3) All certified Trusted Testers.
- (4) Disability Program Manager.

b. Appointed Positions.

- (1) Director, Contract Services (ZEC) shall appoint a procurement and acquisitions subject matter expert (SME) to the ICTAT.
- (2) Director, Enterprise Services (ZTA) shall appoint to the ICTAT SMEs for the following areas:
 - (a) IT acquisition.
 - (b) IT technical support.
 - (c) Cybersecurity.
- (3) Chief, Learning and Development Division (ZHT) shall appoint a training development SME to the ICTAT.
- (4) Chief, Corporate Budget Office (ZRG) shall appoint a resource planning SME to the ICTAT.
- (5) Director, Corporate Communications (ZC) shall appoint a communications SME to

the ICTAT.

(6) Chiefs of Staff for the Site Directors shall appoint an employee from their site to the ICTAT.

c. At-Large Positions. Up to six (6) employees with various disabilities may volunteer to participate upon supervisor approval.

4. RESPONSIBILITIES.

a. The DFAS Section 508 Program Manager shall:

(1) Chair the ICTAT.

(2) Assign an attendee at each meeting to take meeting minutes.

b. A Section 508 Representative shall be the alternate chair of the ICTAT if the DFAS Section 508 Program Manager is unavailable.

c. Members of the ICTAT or their designated representatives shall:

(1) Participate in all scheduled meetings.

(2) Handle all information with the appropriate privacy standards, e.g., Privacy Act.

d. The ICTAT shall:

(1) Perform the responsibilities stated in DoDM 8400.01 paragraph 3.7.a.

(2) Meet at least monthly and as events require.

ENCLOSURE 4

SECTION 508 ANALYSIS

1. The Requirements Owner (RO) shall for all procurements:
 - a. Document a detailed description of the business need or problem in Block 1 of the DFAS Form 1411 that identifies the needs of the users who have disabilities as defined in the Revised 508 Standards (Section E203.2).
 - b. Perform market research and include the results in Block 2 of DFAS Form 1411.
 - (1) Identify technically acceptable products in the marketplace meeting all or as many requirements as possible.
 - (2) Document research, including at a minimum:
 - (a) Vendor names.
 - (b) Versions, if applicable.
 - (c) Model numbers, if applicable.
 - (d) Description of services.
 - (e) How the solutions will meet the business need, specifically addressing:
 1. How users with disabilities will use the product or service to perform their functions.
 2. How the solution(s) is developed, installed, configured, and maintained to support users with disabilities, if applicable.
 - (f) Ways the solution(s) will not meet the business need, if applicable.
 - c. Determine if any of the anticipated solutions are ICT:
 - (1) Review the definition of ICT in the glossary.
 - (2) Go to the <https://www.section508.gov/buy/inventory-your-ict> and review examples of ICT items and the Revised 508 Standards Applicability Checklist.
 - (3) Document whether any of the anticipated solutions are ICT or not ICT in Block 3 of the DFAS Form 1411.
 - (4) If NOT ICT, complete Blocks 10, 11, and 12 of the DFAS Form 1411 and proceed to Enclosure 5, paragraph 1. If ICT, proceed to paragraph 1.d. within this enclosure.

- d. Determine all ICT categories that may apply for the anticipated solution(s) and document the categories in Block 4 of the DFAS Form 1411:
 - (1) Electronic Content (36 CFR 1194.E205, 36 CFR 1194.C203).
 - (2) Hardware (36 CFR 1194.E206, 36 CFR 1194.C204, 36 CFR 1194.401-415).
 - (3) Software (36 CFR 1194.E207, 36 CFR 1194.C205, 36 CFR 1194.501-4504).
 - (4) Support Documentation and Services (36 CFR 1194.C208, 36 CFR 1194.C206, 36 CFR 1194.601-603).
 - (5) Functional Performance Criteria (applies when requirements in Appendix C to 36 CFR 1194, chapter 4 or 5 do not address one or more ICT features (36 CFR 1194.E204, 36 CFR 1194.C202, 36 CFR 1194.302).
 - e. Use the Accessibility Requirement Tool (ART)³ to complete a questionnaire in order to identify accessibility requirements for any anticipated ICT solutions and any exceptions to Section 508 compliance. Perform additional market research as necessary. On the DFAS Form 1411:
 - (1) Identify the exceptions selected as part of the ART analysis in Block 5.
 - (2) Copy the justification from the ART and paste in the applicable justification Block(s) 6-9.
 - (3) Attach the ICT Requirements and the Contract Language Template from the ART.
 - (4) Sign the DFAS Form 1411 and forward all documentation to the responsible Section 508 Representative.
2. The Section 508 Representative shall:
- a. Review submitted DFAS Form 1411 and supporting documentation to ensure accuracy and compliance. Confer with the DFAS Section 508 Program Manager and the Assistant Deputy General Counsel Accounting & Commercial Law (OGC), as needed.
 - b. Do one of the following:
 - (1) Approve by signing the DFAS Form 1411 and return to the RO and provide a copy to the DFAS Section 508 Program Manager and any other necessary parties.
 - (2) Disapprove by returning to the RO, outlining reason(s) for the disapproval and provide a copy to the DFAS Section 508 Program Manager and any other necessary

³ <https://section508.gov/art/home>

parties.

- c. Maintain documentation of the decision IAW DFAS 5015.2-I.
3. The DFAS Section 508 Program Manager shall maintain and track exceptions for all ICT within DFAS by Directorate and/or mission area.
 4. The RO shall:
 - a. Confirm the existence of a completed and signed DFAS Form 1411.
 - b. Submit the procurement package as follows:
 - (1) Contract. Refer to Enclosure 5 of this instruction.
 - (2) Interagency Agreement. Refer to Enclosure 6 of this instruction.
 - (3) IT Development. Refer to DFAS 8430.01-I and Enclosure 7 of this instruction.

ENCLOSURE 5

PROCUREMENT OF INFORMATION AND COMMUNICATION TECHNOLOGY (ICT)
BY CONTRACT SERVICES DIRECTORATE (CSD)

1. If the DFAS Form 1411 indicates the procurement is not for ICT, the RO shall submit the DFAS Form 1411 as part of the requirement documents in the acquisition package.
2. If the procurement is for ICT, the RO shall:
 - a. Submit to the DFAS Contracting Officer the DFAS Form 1411 and the ART documents (ICT Requirements and Contract Language Template).
 - b. Prepare to discuss with the Contracting Officer whether the technical evaluation criteria should include Section 508 requirements.
3. Contracting Officers shall:
 - a. Ensure contract documents comply with Section 508.
 - b. Ensure proper Section 508 language is included in the contract/solicitation that defines all accessibility provisions, clauses, and acceptance criteria.
 - c. If appropriate, include Section 508 solutions as part of the evaluation criteria.
 - d. Request an Accessibility Conformance Report (ACR), based on the latest version of the VPAT, for each ICT item from vendors and contractors to support Section 508 technical evaluations.
4. The Technical Evaluation Team (TET) members shall assess all Section 508 documentation and solutions as directed by the Contracting Officer.
5. The RO shall, if needed, contact the Trusted Tester / Tester for their area to request testing.
6. The Trusted Tester / Tester shall:
 - a. Develop test plan and test scripts from the requirements for Section 508 testing.
 - b. Test the products or services delivered to ensure Section 508 compliance IAW DoDI 8170.01 and DoDM 8400.01 Section 5.7 and meets the requirements outlined in the contract.
 - c. Provide test results to the RO.
7. The RO shall:
 - a. Review the test results to determine compliance.

- b. Collaborate with the DFAS Section 508 Program Manager and Section 508 Representative on the test results for accuracy and completeness, if needed.
 - c. Request additional testing, if needed
 - d. Notify the Contracting Officer, DFAS Section 508 Program Manager, and the Section 508 Representative of acceptance or non-acceptance of the ICT.
8. The Section 508 Representative shall, as needed, update the ICT inventory lists IAW Enclosure 13 Metrics.
9. The Contracting Officers shall:
- a. Verify that products or services delivered meet the accessibility terms and conditions included in a contract prior to accepting deliverables.
 - b. Notify the vendor of acceptance or non-acceptance of the deliverable.
 - c. Maintain in the contract file appropriate records, including market research, to account for exceptions, non-availability, or undue burden determinations for ICT purchases IAW FAR 39.2 and 10.001.

ENCLOSURE 6

PROCUREMENT OF INFORMATION AND COMMUNICATION TECHNOLOGY (ICT)
THROUGH INTERAGENCY AGREEMENTS

If procuring through another Federal agency or DoD component by an interagency agreement, including assisted acquisitions:

1. If the DFAS Form 1411 indicates the procurement is not for ICT:
 - a. The RO shall submit the DFAS Form 1411 with the interagency agreement to the Support Agreements Manager (SAM).
 - b. The SAM shall ensure the routing of the DFAS Form 1411 with the interagency agreement on the DFAS Form 9037.
2. If the procurement is for ICT:
 - a. The RO shall:
 - (1) Ensure the interagency agreement requires the servicing agency to meet all Section 508 requirements.
 - (2) Provide the servicing agency the DFAS Form 1411, applicable ART documents, and any other Section 508 documents required by the servicing agency.
 - (3) If for an assisted acquisition, discuss with the Contracting Officer whether the technical evaluation criteria should include Section 508 requirements.
 - (4) Provide the DFAS Form 1411 and any other necessary Section 508 documentation to the SAM with the interagency agreement.
 - b. The SAM shall ensure the routing of the DFAS Form 1411 and any other Section 508 documentation along with the interagency agreement on the DFAS Form 9037.

ENCLOSURE 7

INFORMATION COMMUNICATION TECHNOLOGY (ICT) LIFE CYCLE ACTIVITIES

1. HOW TO USE THIS ENCLOSURE.
 - a. Use this enclosure in conjunction with the DFAS 8430.01-I to ensure Section 508 requirements are included through the system life cycle.
 - b. For new software development and for all major changes, follow all phases within this enclosure.
 - c. For minor changes, program trouble reports (PTR), and emergency PTRs, begin with paragraph 4 within this enclosure.
2. MATERIEL SOLUTIONS ANALYSIS PHASE. The System Manager (SM) / Program Manager (PM) in consultation with the Section 508 Representative shall include the DFAS Form 1411 in the Milestone A package and address Section 508 business requirements as part of the Business Case Analysis (BCA) and/or System Change Request (SCR).
3. TECHNOLOGY MATURATION AND RISK REDUCTION PHASE. The SM / PM in consultation with the Section 508 Representative shall begin identifying any Section 508 preliminary design considerations in the design documentation (e.g., forms, tables, open/closed captioning, pictorial views, etc.).
4. ENGINEERING AND MANUFACTURING DEVELOPMENT PHASE.
 - a. The developers shall:
 - (1) Ensure the design and development activities are in conformance with U.S. Access Board standards, described in Part 1194 of Title 36, CFR for Section 508.
 - (2) Verify/validate Section 508 compliance during Unit Testing.
 - (3) Resolve any reported Section 508 defects discovered during testing.
 - (4) Provide test results and any resolutions to the SM / PM.
 - b. The SM / PM shall contact the Trusted Tester / Tester for their area to request testing.
 - c. The Trusted Tester / Tester shall:
 - (1) Develop test plan and test scripts from the requirements for Section 508 testing.
 - (2) Participate in the System Integration Test Readiness Review (SITRR).
 - (3) Test the solution during the System Integration Test (SIT) to ensure Section 508 compliance IAW DoDI 8170.01 and DoDM 8400.01 Section 5.7.

- (4) Identify, track, and close test discrepancy reports (TDR) for any non-compliant Section 508 requirements.
 - (5) Send test results and supporting documentation to the SM / PM and assigned Section 508 Representative of all testing activities.
- d. The assigned Section 508 Representative shall:
- (1) Collaborate with the SM / PM and ICT Owner on the test results for accuracy and completeness.
 - (2) Request additional testing, if needed.
5. PRODUCTION AND DEPLOYMENT PHASE.
- a. The Trusted Tester / Tester shall:
- (1) Develop test plan and test scripts from the requirements for Section 508 testing.
 - (2) Participate in the System Acceptance Testing Readiness Review (SATRR).
 - (3) Test the solution during the System Acceptance Test (SAT) to ensure Section 508 compliance IAW DoDI 8170.01 and DoDM 8400.01 Section 5.7.
 - (4) Identify, track, and close TDRs for any non-compliant Section 508 requirements.
 - (5) Send test results and supporting documentation to the SM / PM of all testing activities.
- b. The SM / PM shall:
- (1) Review and verify that all Section 508 testing and documentation is complete.
 - (2) Provide test results to their Section 508 Representative and the DFAS Section 508 Program Manager.
- c. The Section 508 Representative shall:
- (1) Collaborate with the SM / PM and ICT Owner on the test results for accuracy and completeness.
 - (2) Request additional testing, if needed.
 - (3) Update the ICT inventory lists, as needed.
6. OPERATIONS AND SUPPORT PHASE.
- a. The SM / PM along with the Section 508 Representative and Trusted Tester / Tester shall

create a plan of action and milestone (POA&M) IAW Enclosure 9 to address outstanding testing issues.

- b. The SM / PM along with the Section 508 Representative shall:
 - (1) Monitor Section 508 POA&M items.
 - (2) Perform annual review of identified exceptions.
- c. The Trusted Tester / Tester shall:
 - (1) Perform Section 508 testing as requested to ensure the solution remains compliant.
 - (2) Retain all testing documentation for audit purposes.
 - (3) Provide testing documentation and results to the Section 508 Representative.

ENCLOSURE 8

NOTIFICATION AND RESOLUTION OF SECTION 508 ISSUES AND COMPLAINTS

1. REPORTING OF SECTION 508 ACCESSIBILITY ISSUES.

Any individual who believes that ICT developed, procured, maintained, or used by DFAS is not accessible should contact the DFAS Section 508 Program Manager at dfas.indianapolis-in.zta.mbx.section508@mail.mil to resolve the issue. This reporting is not the same as a reasonable accommodation request. Refer to DFAS 1020.1-I, for further guidance, as needed.

2. INITIAL PROCESSING OF REPORTED SECTION 508 ACCESSIBILITY ISSUES.

a. Receipt, Acknowledgement, and Communication of Notice.

(1) The DFAS Section 508 Program Manager shall within two (2) business days of receiving notification of a DFAS Section 508 compliance issue:

(a) Document the issue in the DFAS Section 508 Complaints Tracking Log.

(b) Determine whether the issue is a Section 508 inaccessibility issue:

1. If not a Section 508 inaccessibility issue:

i. Inform the reporter with an explanation.

ii. Close issue in DFAS Section 508 Complaints Tracking Log.

2. If a Section 508 inaccessibility issue:

i. Notify the responsible Section 508 Representative and the DFAS CIO of the issue, including the date DFAS received notification of the issue, and the reporting source (e.g., employee, OEOP, DoD Office of Diversity, Equity, and Inclusion (ODEI), etc.).

ii. Inform the reporter that the issue is under review.

(2) The Section 508 Representative shall within two (2) business days of receiving notification from the DFAS Section 508 Program Manager of a Section 508 inaccessibility issue, identify and notify the ICT Owner of the issue, the date DFAS received notification of the issue, and the reporting source (e.g., employee, OEOP, ODEI, etc.).

b. POA&M.

(1) Develop POA&M. The ICT Owner shall, within five (5) business days, to the extent possible, of receiving notification from the Section 508 Representative:

- (a) Review and analyze the issue.
- (b) Inform their chain of command of the issue.
- (c) Develop a POA&M IAW Enclosure 9.
- (d) Send POA&M to their Section 508 Representative, the Trusted Tester / Tester, the DFAS Section 508 Program Manager, and their chain of command.

(2) Review and Coordinate the POA&M.

- (a) The DFAS Section 508 Program Manager shall:
 - 1. Review the POA&M for completeness and coordinate with the ICT Owner as necessary.
 - 2. Within ten (10) business days of receiving notification of the Section 508 inaccessibility issue, provide the POA&M to the DFAS CIO.
- (b) The DFAS CIO shall:
 - 1. Review the POA&M.
 - 2. Concur/non-concur in writing to the DFAS Section 508 Program Manager and ICT Owner.
 - 3. As relevant, authorize the DFAS Section 508 Program Manager to release the POA&M to other agencies.
- (c) The DFAS Section 508 Program Manager shall upon receiving authorization to release the POA&M from the DFAS CIO, send it to the DoD Section 508 Program Manager and the ODEI, as relevant.

(3) Implement the POA&M.

- (a) The ICT Owner shall:
 - 1. Implement the POA&M if they have not already done so.
 - 2. Provide status updates to the DFAS Section 508 Program Manager every ten (10) business days.
- (b) The DFAS Section 508 Program Manager shall:
 - 1. Provide regular updates to the DFAS CIO on the POA&M implementation.
 - 2. Provide updates to the reporter of the issue on the status of the resolution.

(4) Test the Resolution.

(a) The ICT Owner shall:

1. Coordinate with Trusted Tester / Tester to perform Section 508 testing IAW the POA&M.
2. Contact the reporter to perform testing, if available.

(b) The Trusted Tester / Tester shall:

1. Develop test plan and test scripts from the requirements for Section 508 testing IAW the POA&M.
2. Test the resolution to ensure 508 compliance IAW DoDI 8170.01 and DoDM 8400.01 Section 5.7.
3. Provide test results to the ICT Owner, their Section 508 Representative, the DFAS Section 508 Program Manager, and their chain of command, within five (5) business days of completion of resolution.

(c) The ICT Owner shall:

1. Collaborate with the DFAS Section 508 Program Manager and Section 508 Representative on the test results for accuracy and completeness, if needed.
2. Determine next steps (e.g., additional testing, revise POA&M, request exception, etc.). If testing passes, proceed to b (5).

(5) Closure of POA&M.

(a) The ICT Owner shall provide the DFAS Section 508 Program Manager and the Section 508 Representative with documentation showing completion of the POA&M including completion dates, test results, and any other supporting documentation.

(b) The DFAS Section 508 Program Manager shall within five (5) business days of notification of resolution, provide the DFAS CIO the documentation from the ICT Owner showing completion of the POA&M.

(c) The DFAS CIO shall:

1. Review the documentation from the ICT Owner showing completion of the POA&M.
2. Concur/non-concur in writing that issue has been resolved to the DFAS Section 508 Program Manager and ICT Owner.

3. As relevant, authorize the DFAS Section 508 Program Manager to release test results and other supporting documentation to the other agencies and the reporter.

(d) The DFAS Section 508 Program Manager:

1. May upon receiving authorization from the DFAS CIO release the test results and other supporting documentation to other agencies and the reporter.
2. Shall close the issue on the DFAS Section 508 Complaints Tracking Log.

3. FORMAL COMPLAINT FILED.

- a. Any individual may file a formal complaint with the DFAS Complaints Manager in the DFAS OEOP or the ODEL.
- b. The Complaints Manager shall inform the DFAS Section 508 Program Manager of complaints filed for Section 508 non-compliance issues.
- c. The DFAS Section 508 Program Manager shall:
 - (1) Prepare a notification for the DFAS CIO copying the Section 508 Representative, the ICT Owner and their management of the complaint and whether DFAS had previous knowledge of the complaint and if so, status of actions taken.
 - (2) If the issue is new, follow paragraph 2, within this enclosure.
 - (3) If necessary, schedule a meeting with the DFAS CIO, Section 508 Representative, ICT Owner, and their management to determine a way forward.

ENCLOSURE 9

PLAN OF ACTION AND MILESTONES (POA&M) CONTENTS

DFAS employees shall include the following content in any POA&M that is required by this instruction:

1. Section 508 Representative.
2. ICT Owner and Organization Code.
3. Trusted Tester / Tester.
4. Description of the issue/problem.
5. Description of any temporary workarounds, if applicable.
6. Description of the resolution.
7. Description of verification and/or testing activities.
8. Dates:
 - a. Notification Date.
 - b. Expected Date of Resolution.
 - c. Test Date.
 - d. Milestone Dates.

ENCLOSURE 10

APPOINTMENT OF SECTION 508 REPRESENTATIVES

1. APPOINTING SECTION 508 REPRESENTATIVES.

a. Senior Executives and Site Directors shall:

- (1) Appoint one or more individuals to serve as Section 508 Representatives as necessary to cover the responsibilities of the Section 508 Representatives under this instruction for their organizations by completing the DFAS Form 1412 within 90 days of the issuance of this publication.
- (2) Appoint additional Section 508 Representatives IAW Paragraph 1a (1) of this enclosure as needed or to replace Section 508 Representatives who are no longer able to perform the appointed function.
- (3) Send the completed DFAS Form 1412 to the appointee, supervisor over the appointee, and the DFAS Section 508 Program Manager.
- (4) Notify all employees within the Section 508 Representative's area of responsibility of the appointment.

b. The DFAS Section 508 Program Manager shall:

- (1) Store the DFAS Form 1412 in the Section 508 repository.
- (2) Update Section 508 Appointment list and post to the Section 508 portal page.

2. RESCINDING APPOINTMENTS. All supervisors of Section 508 Representatives shall immediately notify the relevant Senior Executive or Site Director when an employee will no longer be able to perform the appointed function.

ENCLOSURE 11

IDENTIFICATION AND TRAINING OF TRUSTED TESTERS

1. IDENTIFYING TRUSTED TESTERS.

- a. The Directors over systems shall:
 - (1) Identify a sufficient number of Trusted Testers to cover the responsibilities of the Trusted Testers under this instruction for their systems.
 - (2) Send a list of identified Trusted Testers to the supervisor over the employees, the Section 508 Representative, and the DFAS Section 508 Program Manager, including if the Trusted Tester is already certified and the system(s) for which they are responsible to test.
- b. The Director, IT shall identify a Trusted Tester to perform testing for DFAS ICT for organizations that do not have their own Trusted Testers.

2. TRAINING REQUIREMENTS.

- a. The DFAS Section 508 Program Manager shall provide the individuals identified to serve as Trusted Testers guidance on how to obtain the necessary training and certification.
- b. The supervisors over the individuals identified to serve as Trusted Testers shall provide the employees time to attend the training, study for the certification, and take the tests.
- c. The individuals identified to serve as Trusted Testers shall:
 - (1) Complete the Department of Homeland Security (DHS) Trusted Tester Process and Certification Program within one year of being identified.
 - (2) Notify their supervisor if they will not meet the one-year requirement.
 - (3) If certification was not received, notify their supervisor and submit a study plan and training schedule.
 - (4) After receiving the certification, notify their supervisor, DFAS Section 508 Program Manager, Section 508 Representative, and HR.
- d. The DFAS Section 508 Program Manager shall update the Trusted Tester spreadsheet and post to the Section 508 portal page.

ENCLOSURE 12

INVENTORY OF INFORMATION AND COMMUNICATION TECHNOLOGY (ICT)

1. DATA COLLECTION OF INFORMATION AND COMMUNICATIONS TECHNOLOGY (ICT).
 - a. The DFAS Section 508 Program Manager shall:
 - (1) Develop a plan and schedule for collecting ICT inventory within the timeframe outlined in the Policy section within this instruction.
 - (2) Collect as much information as readily available and update the ICT inventory lists located at:
 - (a) Electronic Content:
<https://dfasportal.dfas.mil/it/Lists/508%20ICT%20Documents/AllItems.aspx>.
 - (b) ICT Hardware and Software:
<https://dfasportal.dfas.mil/it/Lists/ICT%20Hardware%20and%20Software/AllItems.aspx>.
 - (3) Notify the Section 508 Representatives that the ICT inventory lists are available for review.
 - b. The Section 508 Representative shall:
 - (1) Review the ICT inventory lists provided by the DFAS Section 508 Program Manager.
 - (2) Within the timeframe provided in the notification, generally within 90 business days of the date of the notification, collaborate with the ICT Owner(s) as necessary to:
 - (a) Verify and/or complete the ICT inventory lists for their area(s) of responsibility.
 - (b) If testing or verification has not been performed within the last 12 months or if the ICT is not Section 508 compliant, complete a POA&M IAW Enclosure 9, in collaboration with the Trusted Tester / Tester. The Section 508 Representative may create one POA&M to cover all testing and verification of ICT in their area of responsibility.
 - (c) Notify the DFAS Section 508 Program Manager of the updates and provide POA&M(s) if applicable.
 - (3) Contact the Trusted Tester / Tester to perform testing IAW the POA&M(s).
 - c. The DFAS Section 508 Program Manager shall review the ICT inventory lists and the POA&M(s) provided by the Section 508 Representatives and collaborate with the Section 508 Representative, ICT Owner, and Trusted Tester / Tester when necessary.

- d. The Trusted Tester / Tester shall:
 - (1) Develop test plan and test scripts from the requirements for Section 508 testing.
 - (2) Perform testing to ensure Section 508 compliance IAW DoDI 8170.01 and DoDM 8400.01 Section 5.7.
 - (3) Provide test results and list of non-compliant ICT to Section 508 Representative and ICT Owner.

 - e. The Section 508 Representative shall:
 - (1) If the testing passed:
 - (a) Update the POA&M(s) including the date the testing passed.
 - (b) Provide test results, updated POA&M(s), and all supporting documentation to the DFAS Section 508 Program Manager and to the ICT Owner.
 - (2) If the testing did not pass:
 - (a) Work with the ICT Owner to determine the mitigation and update the POA&M(s).
 - 1. If new ICT is required, proceed to Enclosure 4.
 - 2. If system update is required, proceed to Enclosure 7.
 - (b) Provide test results, POA&M(s), and all supporting documentation to the DFAS Section 508 Program Manager and to the ICT Owner.
 - (c) Track POA&M(s) items to completion.

 - f. The DFAS Section 508 Program Manager shall:
 - (1) Update the ICT inventory list(s) and other sources (e.g., DEAT, eMASS, Property Book lists), with test dates and test results, as needed.
 - (2) Track POA&M(s) items to completion.
2. SEMI-ANNUAL DATA COLLECTION. The DFAS Section 508 Program Manager shall address data collection through the OMB metrics process as described in Enclosure 13 to include the updates of any new / modified inventory items and the testing of any new / modified ICT.
3. AD HOC DATA COLLECTION. The DFAS Section 508 Program Manager may request ICT data on a case-by-case basis as necessary.

ENCLOSURE 13

SECTION 508 METRICS REPORTING

1. OFFICE OF MANAGEMENT AND BUDGET (OMB) SEMI-ANNUAL SECTION 508 METRICS REPORTING.

- a. The DFAS Section 508 Program Manager shall provide the semi-annual reporting requirements for Section 508 metrics data from the DoD CIO Section 508 Program Manager to the Section 508 Representatives.
- b. The Section 508 Representatives shall provide the semi-annual reporting requirements to the ICT Owners within their area of responsibility.
- c. The ICT Owners shall provide requested data for their areas of responsibility to their Section 508 Representatives by the appointed due date.
- d. The Section 508 Representatives shall:
 - (1) Review the data provided.
 - (2) Consolidate information gathered from the ICT Owners and update the ICT inventory lists as necessary.
 - (3) Provide data to the DFAS Section 508 Program Manager by January 15 and July 15 unless the DFAS Section 508 Program Manager grants an extension.
- e. The DFAS Section 508 Program Manager shall:
 - (1) Review the data provided.
 - (2) Compile all data into a metrics report for the DFAS submission.
 - (3) Update the ICT inventory list(s) and other sources (e.g., DEAT, eMASS, Property Book lists) as necessary.
 - (4) Brief the metrics report to the CIO through management.
- f. The CIO shall approve the metrics report or return it for modification.
- g. The DFAS Section 508 Program Manager shall:
 - (1) Upon approval by the CIO, submit the metrics report to DoD CIO Section 508 office by the requested date.
 - (2) Upon acceptance, report the submission acceptance to the CIO.
 - (3) Upload metrics report to the Section 508 portal page.

- h. The Section 508 Representatives shall request a POA&M from the relevant ICT Owners for all areas that are not to the “MEASURED” status (e.g., ad-hoc, planned, or resourced) within the “Reporting Category” of the metrics report.
- i. The ICT Owners shall:
 - (1) Develop and maintain a POA&M IAW Enclosure 9 to address all areas that are not to the “MEASURED” status within the “Reporting Category” of the metrics report.
 - (2) Provide POA&M to the Section 508 Representative and to the DFAS Section 508 Program Manager.
- j. The DFAS Section 508 Program Manager shall monitor all Section 508 related POA&Ms.

2. DFAS SECTION 508 METRICS REPORTING.

- a. The DFAS Section 508 Program Manager shall provide the Section 508 Representatives the DFAS reporting requirements including:
 - (1) Action items from the OMB semi-annual metrics report in addition to any POA&Ms.
 - (2) Testing requirements, if needed.
 - (3) New reporting requirements, if needed.
- b. The Section 508 Representatives shall provide the DFAS reporting requirements to the ICT Owners within their areas of responsibility.
- c. The ICT Owners shall notify the Trusted Tester / Tester to perform testing, as needed.
- d. The Trusted Tester / Tester shall, as needed:
 - (1) Develop test plan and test scripts from the requirements for Section 508 testing.
 - (2) Perform testing to ensure Section 508 compliance IAW DoDI 8170.01 and DoDM 8400.01 Section 5.7.
 - (3) Provide test results and list of non-compliant ICT to the ICT Owners.
- e. The ICT Owners shall:
 - (1) Update POA&Ms as needed.
 - (2) Provide data for their areas of responsibility, including test results from the Trusted Tester / Tester and POA&Ms, to their Section 508 Representatives by the appointed due date.

- f. The Section 508 Representatives shall:
 - (1) Review the data provided including the test results and POA&Ms.
 - (2) Advise and collaborate with ICT Owners on the data, as needed.
 - (3) Consolidate information gathered from the ICT Owners.
 - (4) Provide data to the DFAS Section 508 Program Manager by the due date.

- g. The DFAS Section 508 Program Manager shall:
 - (1) Review the data provided including the test results and POA&Ms.
 - (2) Advise and collaborate with Section 508 Representatives on the data, as needed.
 - (3) Provide consolidated DFAS status reports on Section 508 POA&Ms to Director, IT Enterprise Services.
 - (4) Monitor all Section 508 related POA&Ms.

ENCLOSURE 14

TRAINING

1. DEVELOPMENT AND REVIEW OF TRAINING COURSES.

- a. The Chief Learning Officer, HR shall develop or provide training for DFAS employees based on the content and materials provided by the DFAS Section 508 Program Manager and make it available to DFAS employees using the DFAS Learning Central.
- b. The DFAS Section 508 Program Manager shall, in consultation with Section 508 Representatives, provide training courses as necessary.
- c. The DFAS Section 508 Program Manager may provide live training courses, as needed.
- d. The Section 508 Representatives shall upon the request of the DFAS Section 508 Program Manager assist in live training courses.
- e. The DFAS Section 508 Program Manager shall review all training courses annually.

2. IMPLEMENTATION OF TRAINING.

- a. The DFAS employees listed in the tables below:
 - (1) Refer to the Section 508 portal for the list of classes that meet the objectives in Tables 1 and 2.
 - (2) Shall take training that meet the objectives IAW Table 1.
 - (3) Are encouraged to take training that meet the objectives IAW Table 2.
- b. The supervisors of the employees identified in the tables below shall:
 - (1) Refer to the Section 508 portal for the list of classes that meet the objectives in Tables 1 and 2.
 - (2) Ensure employees take mandatory training that meet the objectives IAW Table 1.
 - (3) Encourage and allow employees to take training that meet the objectives IAW Table 2.
- c. The ROs shall review Tables 1 and 2 and ensure the contract for the contractor employees requires Section 508 training that meet the objectives appropriate to their duties.
- d. The Chief Learning Officer, HR shall provide training to contractor employees as requested by the Contracting Officer or Contracting Officer Representative (COR) IAW the terms of the contract.

- e. Site Directors that employ foreign nationals shall encourage and allow foreign nationals to take training that meet the objectives IAW Tables 1 and 2.
3. TRACKING. The Chief Learning Officer, HR shall make training completion reports from the DFAS LEARNING CENTRAL available to the Section 508 Program Manager and Section 508 Representatives.

ENCLOSURE 15

TESTING: VERIFICATION OF SECTION 508 COMPLIANCE

DFAS Section 508 Program Manager, Section 508 Representatives, ICT Owners, SMs / PMs, ROs, and testers shall be aware of, review, and follow these testing paragraphs within this instruction:

1. Purchase of ICT: Enclosure 5, paragraph 5.
2. System changes: Enclosure 7, paragraphs 4 or 5.
3. Complaints: Enclosure 8, paragraph 2b (4).
4. Inventory: Enclosure 12, paragraph 1f.
5. Metrics: Enclosure 13, paragraph 2.

ENCLOSURE 16

SECTION 508 APPLICABILITY STATEMENT FOR DFAS WEBSITES

1. The SMs / PMs shall ensure all webpages and portals have a Section 508 applicability statement on their main page.
2. The DFAS Section 508 Program Manager shall request the review of the applicability statement annually.
3. The DFAS Section 508 Representatives shall review the applicability statement for all webpages and portals in their areas of responsibility annually.
4. The DFAS developers, web developers, and SMs / PMs shall check the accuracy of the links and contact information contained in the applicability statement annually.

GLOSSARY

PART I. ABBREVIATIONS AND ACRONYMS

ART	Accessibility Requirement Tool
ACR	Accessibility Conformance Report
BCA	Business Case Analysis
CCB	Configuration Control Board
CFR	Code of Federal Regulations
CIO	Chief Information Officer
COR	Contracting Officer Representative
DEAT	DFAS Enterprise Architecture Tool
DoDI	DoD Instruction
eMASS	Enterprise Mission Assurance Support Service
FAR	Federal Acquisition Regulation
GSD	Global Service Desk
HR	Human Resources
IAW	In Accordance With
ICT	Information and Communications Technology
ICTAT	Information and Communication Technology (ICT) Accessibility Team
IT	Information Technology
OEOP	Office of Equal Opportunity Programs
ODEI	Office of Diversity, Equity, and Inclusion
OGC	Office of General Counsel
OMB	Office of Management and Budget
PDF	Portable Document Format
PM	Program Manager
POA&M	Plan of Action and Milestones
PTR	Program Trouble Report
RO	Requirements Owner
SAM	Support Agreements Manager
SAT	System Acceptance Test
SATRR	System Acceptance Test Readiness Review
SCR	System Change Request
SIT	System Integration Test
SITRR	System Integration Test Readiness Review

SM	System Manager
SME	Subject Matter Expert
TET	Technical Evaluation Team
TDR	Test Discrepancy Report
VPAT	Voluntary Product Accessibility Template
WCAG	Web Content Accessibility Guidelines

PART II. DEFINITIONS

Assistive Technology (AT). As defined in the section508.gov glossary.

Audio Description. As defined in the section508.gov glossary.

Closed Functionality. As defined in the section508.gov glossary.

Content. As defined in the section508.gov glossary.

DFAS Official Communications: Any information requiring dissemination to DFAS employees such as:

- An emergency notification.
- An internal or external program or policy announcement.
- A notice of benefits, program eligibility, employment opportunity, or personnel action.
- A survey questionnaire.
- A template or form.
- Educational or training materials.
- Intranet content designed as a Web page.
- Daily News.
- Senior Leadership announcements.
- CIO Alerts.

DFAS Section 508 Information and Communication Technology (ICT) Accessibility Team (DFAS ICTAT or ICTAT). The DFAS Section 508 Accessibility Team as required by the DoDM 8400.01. At DFAS, the ICTAT is comprised of the DFAS Section 508 Program Manager, Section 508 Representatives, Trusted Testers, Contract Services SME, IT acquisition SME, IT technical support SME, cybersecurity SME, LDD SME, HR specialist, Corporate Budget SME, Corporate Communications SME, site representatives, and representatives with different types of disabilities.

Document. As defined in the section508.gov glossary.

Existing ICT. As defined in the section508.gov glossary.

Hardware. As defined in the section508.gov glossary.

Information Technology. As defined in 40 U.S.C. §11101(6).

Information and Communication Technology (ICT) also known as Electronic and Information Technology (EIT). As defined in DoDM 8400.01.

ICT Owner. At DFAS, the position that is responsible for the purchasing, maintenance, and control of the ICT.

Name. As defined in the section508.gov glossary.

Public Facing. As defined in the section508.gov glossary.

Reporter. Any individual who reports that an ICT developed, procured, maintained, or used by DFAS is not accessible.

Reporting Categories.

- a. Ad Hoc: No formal policies, processes, or procedures defined
- b. Planned: Policies, processes, and procedures defined and communicated
- c. Resourced: Resources committed and / or staff trained to implement policies, processes, and procedures
- d. Measured: Validation is performed; results are measured and tracked.

Requirements Owner (RO). An official in the program office or organization that is funding and acquiring the ICT.

Revised 508 Standards. As defined in the section508.gov glossary.

Software. As defined in the section508.gov glossary.

Software Tools. As defined in the section508.gov glossary.

Technical Evaluation Team. An ad hoc team assigned by the Requirements Owner to evaluate contract quotes from a technical perspective.

Web page. As defined in the section508.gov glossary.

TABLES

1. MANDATORY SECTION 508 TRAINING OBJECTIVES

Category of Employee	Objectives	Required
GS-15 and above, Section 508 Program Manager, Section 508 Representatives	A high-level overview of the Revised 508 Standards which explains roles and responsibilities of Federal government, executives, and agency heads	Current employees: within 90 days from the date of this instruction to the extent possible. New employees: Within one year of supervisor/manager assignment. Refresher training every three years.
Acquisition Specialist Duties, Certifying Officers, CORs, TETs	Describes how to make micro-purchases that conform to the Revised 508 Standards and how the requirements apply to micro-purchases of hardware, software, and other ICT	Current employees: within 30 days from the date of this instruction to the extent possible. New employees: Prior to working on any contract

Category of Employee	Objectives	Required
Section 508 Representatives, DFAS Section 508 Program Manager		Within 30 days of appointment
DFAS Section 508 Program Manager, Section 508 Representatives	Describes the 12 plays to integrate strategic business and technology management into a successful Section 508 program ensuring Federal ICT is accessible to persons with disabilities	Current employees: within 90 days from the date of this instruction to the extent possible. New employees: within 90 days of employment. Section 508 Representatives: Within 30 days of appointment
Anyone responsible for ensuring ICT products and services are Section 508 conformant, including Supervisors, System Managers, Acquisition and Procurement staff, Section 508 Representatives, DFAS Section 508 Program Manager	Basic overview of the Federal acquisition process with regard to procuring ICT products and services that conform to Section 508	Current employees: within 90 days from the date of this instruction to the extent possible. New employees: within 90 days of employment.
Content Managers, Anyone responsible for DFAS official communications (see Glossary)	Explains and demonstrates the minimum steps needed to ensure the Section 508 compliance of the following types of files: ○ PDF ○ Microsoft PowerPoint ○ Microsoft Word Microsoft Excel	Current employees: within 90 days from the date of this instruction to the extent possible. New employees: Prior to being able to post documents.
DFAS Section 508 Program Manager, Section 508 Representatives		Within 30 days of appointment

2. RECOMMENDED SECTION 508 TRAINING OBJECTIVES

Category of Employee	Objectives
All DFAS Employees, GS-14 and below	<p>Introduction to Section 508 and Information and Communication Technology (ICT):</p> <ul style="list-style-type: none"> • Explains what Section 508 is and why it's important • Shows how conformance can make ICT more accessible • Reviews job-related responsibilities for meeting Section 508 standards <p>Offers resources to help you meet your Section 508</p>
Anyone who is responsible for any system life cycle activities, GS-2210 series, GS-1102 series, TETs	<ul style="list-style-type: none"> • Describes the 12 plays to integrate strategic business and technology management into a successful Section 508 program ensuring Federal ICT is accessible to persons with disabilities • WCAG overview
Anyone who develops Portable Document Format (PDF) files for distribution	Explain and demonstrate the minimum steps needed to ensure your PDF conforms to Section 508 standards
Anyone who develops PowerPoint presentations for distribution	Explain and demonstrate the minimum steps needed to ensure your Microsoft PowerPoint presentation conforms to Section 508 standards
Anyone who develops Word documents for distribution	Explain and demonstrate the minimum steps needed to ensure your Microsoft Word document conforms to Section 508 standards
Anyone who develops Excel spreadsheets for distribution	Explain and demonstrate the minimum steps needed to ensure your Microsoft Excel spreadsheet conforms to Section 508 standards