

**BY ORDER OF THE
SECRETARY OF THE AIR FORCE**



AIR FORCE INSTRUCTION 33-393

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Incorporating Change 2, 3 June 2016

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Communications and Information

***ELECTRONIC AND INFORMATION
TECHNOLOGY ACCESSIBLE TO
INDIVIDUALS WITH DISABILITIES,
SECTION 508***

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This Instruction implements Air Force Policy Directive (AFPD) 33-3, *Information Management*. Section 508 of the Rehabilitation Act of 1973 (Title 29 United States Code Section 794d), as amended by the Workforce Investment Act of 1998 (Public Law 105-220), requires all Federal agencies to make their Electronic and Information Technology (E&IT) accessible to people with disabilities when they develop, procure, maintain, or use E&IT products. Section 508 of the Rehabilitation Act of 1973 is applicable to E&IT developed or having major modification after 21 June 2001. This instruction applies to all Air Force active duty military, civilians, and contractors in the performance of their duties to an Air Force contract, the Air Force Reserve, Air National Guard, and Civil Air Patrol when performing functions for the Air Force, and in accordance with DoD Directive (DoDD) 5100.3, *Support of the Headquarters of Combatant and Subordinate Unified Commands*. Send recommended changes or comments to Secretary of the Air Force, Cyberspace Capabilities and Compliance, Compliance Division (SAF/CIO A6XA), 1800 Air Force Pentagon, Washington DC 20330-1800, through appropriate channels, using Air Force (AF) Form 847, *Recommendation for Change of Publication*. The authorities to waive wing/unit level requirements in this publication are identified with a Tier (“T-0, T-1, T-2, T-3”) number following the compliance statement. See AFI 33-360, *Publications and Forms Management*, Table 1.1 for a description of the authorities associated with the Tier numbers. Submit requests for waivers through the chain of command to the appropriate Tier waiver approval authority, or alternately, to the Publication OPR for non-tiered compliance items.

Ensure that all records created as a result of processes prescribed in this publication are maintained IAW Air Force Manual (AFMAN) 33-363, Management of Records, and disposed of IAW the Air Force Records Disposition Schedule (RDS) in the Air Force Records Information Management System (AFRIMS).

SUMMARY OF CHANGES

This interim change revises AFI 33-393 by (1) transferring responsibility, and (2) updating office symbols, hyper-link, policy signature block, and email addresses to reflect current organizations. A margin bar (|) indicates changed material.

1. Background. In 1998 Congress amended the Rehabilitation Act to include enforcement language that supports the requirement for Federal agencies to make their E&IT accessible to people with disabilities. Section 508 was enacted to eliminate barriers in information technology, to make available new opportunities for people with disabilities, and to encourage development of technologies that will help achieve these goals. Under Section 508 (29 USC § 794d), agencies must give employees and members of the public with disabilities access to information that is comparable to the access available to others.

2. General. The Air Force corporate approach to Section 508 implementation follows the guidelines established by the Office of the Secretary of Defense (OSD) of “centralized management with decentralized execution.” This approach provides a corporate strategy that will lead the Air Force to its goal: **“To provide an Air Force-wide coordinated Section 508 effort that addresses all legal requirements and provides maximum access to E&IT while maintaining full mission focus and capabilities.”** The Chief of Information Dominance and Chief Information Officer (SAF/CIO A6) has overall responsibility for addressing Section 508 challenges and to ensure the Air Force Section 508 project addresses E&IT accessibility issues before they adversely affect the mission and mission support functions. Conquering Section 508 challenges will require the cooperative efforts of content managers, developers, contracting officers, program managers, portfolio managers and requiring officials at every Air Force level. People with disabilities must be given the opportunity to maximize their contribution to the success of the Air Force mission by maximizing the accessibility features of E&IT equipment.

3. Roles and Responsibilities. Successful implementation of Section 508 hinges on the coordination of many groups throughout the Department of Defense (DoD) and within the Air Force.

3.1. SAF/CIO A6 shall (T-1):

3.1.1. Appoint an Air Force Section 508 Coordinator.

3.1.2. Manage Section 508 compliance of Air Force E&IT resources.

3.1.3. Provide Air Force Section 508 implementation oversight and ensure the Air Force applies Section 508 requirements across the enterprise.

3.1.4. Ensure Section 508 compliance based on the United States Access Board (US Access Board) standards at <https://www.access-board.gov/>.

3.2. The Air Force Section 508 Coordinator shall (T-1):

- 3.2.1. Support, promote, and implement the requirements of Section 508 of the Rehabilitation Act.
- 3.2.2. Develop and distribute Section 508 related policy and guidance.
- 3.2.3. Monitor and report Section 508 implementation progress.
- 3.2.4. Create performance measures focused on the goals of ensuring accessibility of E&IT. Goals must be translated into measurable elements by which performance can be gauged. (T-1)
- 3.2.5. Provide sources of Section 508 education and training.
- 3.2.6. Review and certify Program Manager's Undue Burden exemption.
- 3.2.7. Establish a Section 508 E&IT Accessibility Team according to guidance outlined in DoD 8400.01-M, *Procedures for Ensuring the Accessibility of Electronic and Information Technology (E&IT) Procured by DoD Organizations*.
- 3.2.8. Establish internal policies, procedures, and governance structures necessary to implement Section 508 requirements, and ensure these requirements are appropriately considered and clearly stated in pertinent acquisition documents.
- 3.2.9. Work with Office of the Secretary of the Air Force for Acquisition (SAF/AQ) to assure that procurement policy documents and procedures address Section 508.

3.3. Commanders and Directors shall implement this Instruction. Headquarters Air Force (HAF) and Secretary of the Air Force (SAF) functional organization, MAJCOM, Wing Level or below, DRU, and FOA appoints a Section 508 Coordinator and sends an appointment letter to Air Force Section 508 Coordinator, usaf.pentagon.saf-cio-a6.mbx.af-section-508@mail.mil to include the name, functional address symbol, e-mail address, and telephone number of the assigned Section 508 Coordinator. (T-1)

3.4. Section 508 Coordinators shall (T-2):

- 3.4.1. Distribute Section 508 guidance as required for personnel within their organization who are involved in the Section 508 process.
- 3.4.2. Identify E&IT, products, procedures, and processes in their area of responsibility that are not Section 508 compliant.
- 3.4.3. Initiate action to replace a non-compliant item with a compliant one as necessary.
- 3.4.4. Monitor and report Section 508 progress to Air Force Section 508 Coordinator.
- 3.4.5. Validate that web pages and procurement policy documents are Section 508 compliant in accordance with Federal Acquisition Regulation (FAR), <https://www.acquisition.gov>.
- 3.4.6. Provide Section 508 training for personnel within their organization who are involved in the Section 508 process.
- 3.4.7. Assist in documenting the basis for an undue burden decision and retain documentation.

3.4.8. Review Program Manager's Undue Burden exemption. Exemptions are not to exceed 1 year.

3.4.9. Participate in Government Purchase Card Training provided by the contracting office by providing Section 508 training material and briefing the material when possible.

3.4.10. Assist Government Purchase Card holders to comply with Section 508 requirements by assisting with market research and documenting purchase decisions that do not comply.

3.4.11. Assist Program Managers with market research for Section 508 E&IT requirements.

Document the Undue Burden, which standards cannot be met, and provide a copy to the Air Force Section 508 Coordinator. If a Program Manager determines that compliance with U.S. Access Board standards in procurements imposes an undue burden, the Section 508 Coordinator shall document the basis for an undue burden decision describing (T-2):

3.4.11.1. The products or services required.

3.4.11.2. The dollar value of the acquisition.

3.4.11.3. The applicable technical provision that cannot be met.

3.4.11.4. The market research performed to locate commercial items that meet the applicable standards, and the specific reason(s) why the technical provision cannot be met.

3.4.11.5. The costs and how they were estimated if monetary expense is deemed prohibitive.

3.4.11.6. The alternative means by which the Program Manager will provide individuals with disabilities access to the data and information involved.

3.5. Content Managers shall (T-0):

3.5.1. Provide data necessary to assess status of Section 508 web compliance in terms of total active web pages conforming to the relevant criteria established by the Architectural and Transportation Barriers Compliance Board (Access Board) in their Electronic and Information Technology Accessibility Standards document located at <http://www.access-board.gov>.

3.5.2. Ensure every image has an alternative text per Section 508 requirements.

3.5.3. Ensure any customized HTML/CSS, JavaScript or other locally produced and used code is compliant with Section 508 requirements, including changing old HTML to appropriate modern equivalents and in-line CSS equivalents.

3.6. Developers shall (T-2):

3.6.1. Ensure the structure of all websites are Section 508 compliant including metadata and meta tags for titles, description, keywords and appropriately stacked headline requirements.

3.6.2. Pay close attention to Section 508 requirements for iFrames, JavaScript, tables and all other specific requirements.

3.6.3. Remediate failed web sites and retest, repeat until compliance is achieved. Use available online tools to ensure websites are Section 508 compliant.

3.7. Contracting Officers and Procurement Officials shall (T-0):

3.7.1. Implement Air Force procurement policies and directives consistent with the Federal Acquisition Regulations (FAR) <http://www.acquisition.gov/far>.

3.7.2. Assist requiring officials with market research for Section 508 E&IT requirements.

3.7.3. Develop acquisition strategies for acquiring E&IT that meets applicable Section 508 standards.

3.7.4. Coordinate with requiring officials to ensure that solicitations include the application clauses for E&IT and terms and conditions for Section 508 compliance.

3.7.5. Ensure applicable documents provided by the requiring official are included in the contract file.

3.7.6. Promote Section 508 compliance at Government Purchase Card Training.

3.7.7. Review Section 508 compliance based on standards at <http://www.access-board.gov> as part of Government Purchase Card surveillance.

3.8. Program Managers and/or Requiring Officials shall (T-1):

3.8.1. Identify which standards apply to the procurement, using the U.S. Access Board's E&IT Accessibility Standards document.

3.8.2. Identify which standards, if any, would not apply in the procurement because of non-availability or undue burden.

3.8.3. Perform market research to determine availability of compliant products and services.

3.8.4. Develop technical specifications and minimum requirements based on the market research and agency needs.

3.8.5. Prepare E&IT requirements documents for placement of task or delivery orders.

3.8.6. Seek assistance from the Section 508 Coordinator and the contracting officer early in the requirements process, when necessary.

3.8.7. Assist in documenting non-availability, including a description of market research performed and which standards cannot be met. Retain documentation in the product procurement file.

3.8.8. Ensure that statements of work (SOWs) include a statement of the U.S. Access Board standards that apply; a statement that identifies which standards, if any, would not apply in the procurement because of non-availability or undue burden; draft technical specification and minimum Section 508-related requirements.

3.8.9. Review the SOWs and purchase request to ensure that Section 508 requirements are addressed.

3.8.10. Certify and submit Section 508 compliance template to Section 508 Coordinator (<http://www.privacy.af.mil/shared/media/document/AFD-110919-059.pdf>).

3.8.11. Ensure that solicitations for E&IT state that products offering equivalent facilitation must be considered along with those that strictly meets the technical provisions of the standards. Equivalent facilitation does not constitute a waiver or variance from the requirement to provide accessibility, but recognizes that future technologies may be developed, or existing technologies modified, to provide the same functional access in ways not foreseen by the U.S. Access Board.

3.8.12. Notify the Section 508 Coordinator about all complaints of alleged noncompliance and plan for resolution. If the issues are not resolved in a reasonable time, employees may file complaints alleging that the Air Force is not in compliance. Complaints of alleged noncompliance should be filed with the Equal Opportunity Office. If resolution is not achieved, further complaints may be raised.

3.9. Government Purchase Card Holders shall (T-0):

3.9.1. Procure only E&IT products that have been evaluated for Section 508 compliance based on standards at <http://www.access-board.gov>.

3.9.2. Verify, in writing, which standards apply to the procurement, using the U.S. Access Board's E&IT Accessibility Standards document.

3.9.3. Assist documenting the non-availability including a description of market research performed and which standards cannot be met and retain documentation in the product procurement file.

3.9.4. Assist in documenting the basis for an undue burden decision and retain documentation in the product procurement file.

3.10. Office of the Secretary of the Air Force for Acquisition (SAF/AQ) shall (T-1):

3.10.1. Ensure Air Force contracting offices have access to contracts that provide Section 508 compliant E&IT equipment.

3.10.2. Assist the Air Force Section 508 Coordinator to interpret and/or resolve acquisition related issues.

3.11. Air Force Equal Opportunity Office (AF/A1Q):

3.11.1. AF/A1Q is the designated OPR for oversight of complaints involving noncompliance with Section 508. AF/A1Q must be advised of all violations pertaining to the AFI. **(T-1)**

3.11.2. Complaints of alleged noncompliance with Section 508 shall be processed in accordance with AFI 36-2707, *Nondiscrimination in Programs and Activities Assisted or Conducted by the Department of the Air Force*. **(T-1)**

WILLIAM J. BENDER, Lt Gen, USAF
Chief, Information Dominance and
Chief Information Officer

Attachment 1**GLOSSARY OF REFERENCES AND SUPPORTING INFORMATION*****References***

Title 29 United States Code Section 794d (Section 508 of the Rehabilitation Act of 1973)

Title 40 United States Code Sections 11101-11704 (Clinger-Cohen Act of 1996 (CCA))

Title 36, Code of Federal Regulations, Part 1194, Electronic and Information Technology Accessibility Standards, December 21, 2000, <http://www.access-board.gov/sec508/standards.htm>.

Federal Acquisition Regulations; Part 39, Acquisition of Information Technology, Subpart 39.2, Electronic and Information Technology

Codified in title 42 United States Code and Title 47 United States Code, Code of Federal Regulations, Part 84 of title 45, Americans with Disabilities Act of 1990, as amended

DoDD 4630.05, *Interoperability and Supportability of Information Technology (IT) and National Security Systems (NSS)*, April 23, 2007

DoDD 8000.1, *Management of the Department of Defense Information Enterprise*, February 10, 2009

DoDD 5144.1, *Assistant Secretary of Defense for Networks and Information Integration/DoD Chief Information Officer (ASD(NII)/DoD CIO)*, May 2, 2005

DoDD 5134.01, *Under Secretary of Defense for Acquisition, Technology, and Logistics (USD(AT&L))*, December 9, 2005, w/Change 1, April 1, 2008

DoDD 1440.1, *The DoD Civilian Equal Employment Opportunity (EEO) Program*, November 21, 2003

DoD 7000.14-R, *Department of Defense Financial Management Regulations (FMRs)*, current edition

DoD 8400.01-M, *Procedures for Ensuring Accessibility of Electronic and Information Technology (E&IT) Procured by DoD Organizations*, current edition

AFPD 33-3, *Information Management*, 8 September 2011

AFI 33-129, *Web Management and Internet Use*, 3 February 2005

AFI 36-2707, *Nondiscrimination in Programs and Activities Assisted or Conducted by the Department of the Air Force*, 16 December 2010

AFMAN 33-363, *Management of Records*, 1 March 2008

Prescribed Forms

None.

Adopted Forms

AF Form 847, Recommendation for Change of Publication

Abbreviations and Acronyms

AF CIO—Air Force Chief Information Officer

AFI—Air Force Instruction

AFMAN—Air Force Manual

AFPD—Air Force Policy Directive

DRU—Direct Reporting Unit

E&IT—Electronic and Information Technology

FAR—Federal Acquisition Regulation

FOA—Field Operating Agency

GSAGeneral Services Administration—ITInformation Technology

MAJCOM—Major command

OSD—Office of the Secretary of Defense

PM—Project Manager

RDS—Records Disposition Schedule

SAF—Secretary of the Air Force

USC—United States Code

Terms

Content Manager (Web Master)—The individual, USAF active duty, reserve, air national guard, civilian or contractor who is responsible for uploading content to an official use USAF website via a Content Management System. This includes content providers who have no ability to modify the layout, but only contribute photos and articles.

Content Management System—The software application used to upload, edit, and manage content displayed on an AF public or private website.

Developer—The company or persons responsible for building and maintaining the infrastructure of a content management system for public websites for the USAF. This includes any person responsible for building USAF websites.

Electronic and Information Technology (E&IT)—Includes IT and any equipment, or interconnected system of equipment used in the creation, conversion, or duplication of data or information. The term E&IT includes, but is not limited to, telecommunications products (such as telephones), information kiosks, and transaction machines. IT does not include any equipment that contains embedded IT used as an integral part of the product, but whose principal function is not the acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information (29 USC § 794d). Section 508(a)(5) and The Electronic and Information Technology Accessibility Standards of the U.S. Access Board specifically exclude National Security Systems (as defined in 40 USC § 11103(a)) from the requirements of Section 508. (29 USC § 794d(a)(5))”.

Information Technology (IT)—Any equipment or interconnected system or subsystem of equipment used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. This includes equipment used by the executive agency directly or used by a contractor under a contract with the executive agency, which (i) requires the use of such equipment, or (ii) requires the use, to a significant extent, of such equipment in the performance of a service or the furnishing of a product. The term “IT” includes computers, ancillary equipment, software, firmware, and similar procedures, services (including support services), and related resources. Notwithstanding the preceding, the term “IT” does not include any equipment that is required by a federal contractor incident to a federal contract. The term “IT” includes National Security Systems (NSS), and is synonymous with the term “information system” (IS). (DoDD 4630.5, DoDD 8000.1, 40 USC § 11101(6))

Market research—The process of collecting and analyzing information about the market’s capability to satisfy a specified need.

Metadata—Metadata describes other data. It provides information about a certain item’s content. Web pages often include metadata in the form of meta tags. Description and keywords meta tags are commonly used to describe the Web page’s content. Most search engines use this data when adding pages to their search index.

Meta Tag—This is a special HTML tag that is used to store information about a Web page but is not displayed in a Web browser. For example, meta tags provide information such as what program was used to create the page, a description of the page, and keywords that are relevant to the page. Many search engines use the information stored in meta tags when they index Web pages.

Non—Availability—Circumstances where no commercial items are available that meet the Access Board’s applicable technical provisions (directly or through equivalent facilitation) in time to satisfy the agency’s delivery requirements. If products are available that meet some, but not all, applicable provisions, agencies cannot claim a product as a whole is non-available just because it does not meet all of the applicable technical provisions.

Private Internet Service—A USAF internet service with access controls in place to limit availability of non-public information or exchanges of non-public information to specific audiences. The Air Force Portal is a good example.

Public Web—A USAF Internet service on the worldwide web used to disseminate, store, or otherwise process information that has been cleared and authorized for release to the public.

Statement of Work (SOW)—The formal document that captures and defines the work activities, deliverables and timelines a vendor will execute against in performance of specified work for a client. Detailed requirements and pricing are usually included in the Statement Of Work, along with standard regulatory and governance terms and conditions.

Undue Burden—The U.S. Access Board’s standards and the Federal Acquisition Regulations (FAR) define an undue burden as a significant difficulty or expense; see Title 36, Code of Federal Regulations (CFR), Part 1194.4, Electronic and Information Technology Accessibility Standards and Federal Acquisition Regulations (FAR) Part 39, Acquisition of Information Technology, Subpart 39.2, Electronic and Information Technology. In determining whether acquiring E&IT that meets all or part of the applicable technical provisions of the Access

Board's standards would impose an undue burden, an agency must consider all resources available to its program or component for which the supply or service is being acquired.

U.S. Access Board—An independent Federal agency charged with developing technical and functional standards to establish a minimum level of accessibility for persons with disabilities. The Board develops and maintains design criteria for E&IT and provides technical assistance and training on these requirements and on accessible design. The Board's E&IT accessibility standards, set forth in Reference (d), have been incorporated into the FAR and are located at <http://www.access-board.gov/>. The Board also enforces physical accessibility standards that cover federally funded facilities.