

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

AIR FORCE INSTRUCTION 33-393

3 JULY 2019



Communications and Information

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

COMPLIANCE WITH THIS PUBLICATION IS MANDATORY

ACCESSIBILITY: Publications and forms are available for downloading or ordering on the e-Publishing website at www.e-publishing.af.mil.

RELEASABILITY: There are no releasability restrictions on this publication.

OPR: SAF/CNZA

Certified by: SAF/CNZ
(Ms. Wanda Jones-Heath)

Supersedes: AFI 33-393, 10 April 2013

Pages: 10

This Air Force Instruction (AFI) 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), and Department of Defense Manual (DoDM) 8400.01, *Accessibility of Information and Communications Technology (ICT)*. It requires all Federal agencies to make their electronic and information technology accessible to people with disabilities when they develop, procure, maintain, or use electronic and information technology products. Section 508 of the Rehabilitation Act of 1973 is applicable to electronic and information technology 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 Department of Defense Directive (DoDD) 5100.03, *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/CNZA), 1800 Air Force Pentagon, Washington DC 20330-1800, through the appropriate functional chain of command channels, using Air Force 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*, 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 requestor's commander for non-tiered compliance items. Ensure all records created as a result of processes prescribed in this publication are maintained in accordance with Air Force Manual (AFMAN) 33-363, *Management of Records*, and disposed of in accordance with the Air Force Records Disposition Schedule located in the Air Force Records Information Management System. The use of the name or mark of any specific manufacturer, commercial product, commodity, or service in this publication does not imply endorsement by the Air Force.

SUMMARY OF CHANGES

This document has been substantially revised and needs to be completely reviewed. Major changes include updating office symbols, acronyms, hyper-links, policy signature block, and email addresses to reflect current organizations.

PURPOSE, SCOPE, AND RESPONSIBILITIES

1. Purpose. In 1998 Congress amended the Rehabilitation Act to include enforcement language that supports the requirement for Federal agencies to make their electronic and information technology 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, unless an undue burden would be imposed on the department or agency.

2. Scope. The Air Force corporate approach to Section 508 implementation follows the guidelines established by the Office of the Secretary of Defense 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 electronic and information technology while maintaining full mission focus and capabilities." The Office of the Secretary, Deputy Chief Information Officer, has overall responsibility for addressing Section 508 challenges and to ensure the Air Force Section 508 project addresses electronic and information technology 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 electronic and information technology equipment.

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

3.1. SAF/CNZA shall (T-1):

3.1.1. Appoint an Air Force Section 508 coordinator.

3.1.2. Manage Section 508 compliance of Air Force electronic and information technology 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 U.S. 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 electronic and information technology. Goals must be translated into measurable elements by which performance can be gauged.

3.2.5. Provide sources of Section 508 education and training.

3.2.6. Review and certify Air Force program manager's undue burden exemption.

3.2.7. Establish a Section 508 electronic and information technology accessibility team according to guidance outlined in DoDM 8400.01-M, *Procedures for Ensuring the Accessibility of Electronic and Information Technology Procured by Department of Defense Organizations*.

3.2.8. Establish internal policies, procedures, and governance structures necessary to implement Section 508 requirements, and ensure all contracting offices of primary responsibility have considered and clearly stated the requirements in pertinent acquisition documents.

3.2.9. Work with Office of the Secretary of the Air Force for Acquisitions to assure that procurement policy documents and procedures address Section 508.

3.3. Commanders and Directors shall implement this Instruction. Headquarters Air Force and Secretary of the Air Force functional organization, major commands, wing level or below, direct reporting unit, and field operating agency appoints a Section 508 coordinator. These organizations each send an appointment letter to Air Force Section 508 Coordinator, usaf.pentagon.saf-cn.mbx.af-section-508@mail.mil. The letter will 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 electronic and information technology, products, procedures, and processes in their area of responsibility that are not Section 508 compliant.

3.4.3. Provide a list of approved Section 508 accommodation software from the Air Force evaluated product list to requesting personnel as needed. Coordinate accommodation software access with the Air Force Section 508 Coordinator and the Air

Force Disability Program Manager. The Air Force evaluated product list can be found at <https://cs2.eis.af.mil/sites/10336/Lists/COTSGOTS%20Software/EPL.aspx>.

3.4.4. Monitor and report Section 508 progress upon request 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 Regulations, <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 one 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 electronic and information technology requirements.

3.4.12. 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 Air Force Section 508 Coordinator shall document the basis for an undue burden decision describing (T-2):

3.4.12.1. The products or services required.

3.4.12.2. The dollar value of the acquisition.

3.4.12.3. The applicable technical provision that cannot be met.

3.4.12.4. 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.

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

3.4.12.6. 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 (U.S. 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 modern equivalents and in-line CSS equivalents.

3.6. Website 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 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, <https://www.acquisition.gov>.

3.7.2. Assist requiring officials with market research for Section 508 electronic and information technology requirements.

3.7.3. Develop acquisition strategies for acquiring electronic and information technology that meets applicable Section 508 standards.

3.7.4. Coordinate with requiring officials to ensure that solicitations include the application clauses for electronic and information technology and terms and conditions for Section 508 compliance.

3.7.5. Ensure applicable electronic and information technology 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 <https://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 *Electronic and Information Technology Accessibility Standards* document at <https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards/section-508-standards>.

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 electronics and information technology 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 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 statement of work and purchase request to ensure that Section 508 requirements are addressed.

3.8.10. Certify and submit Section 508 compliance template to the Air Force Section 508 Coordinator.

3.8.11. Ensure that solicitations for electronic and information technology state that products offering equivalent facilitation must be considered along with those that strictly meet the technical provisions of the standards. Equivalent facilitation does not constitute a waiver or variance from the requirement to provide accessibility. Equivalent facilitation does, however, recognize that future technologies may be developed, or existing technologies modified, to provide the same functional access. Such new or modified technologies may provide access in ways not foreseen by the U.S. Access Board.

3.8.12. Notify the Air Force 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 electronics and information technology 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 *Electronics and Information Technology 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 shall (T-1):

3.10.1. Ensure Air Force contracting offices have access to contracts that provide Section 508 compliant electronic and information technology 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:

3.11.1. The Air Force Equal Opportunity Office is the designated office of primary responsibility for oversight of complaints involving noncompliance with Section 508. The Air Force Equal Opportunity Office must be advised of all violations pertaining to the Air Force Instruction.

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*.

WILLIAM E. MARION II, SES, USAF
Deputy Chief Information Officer

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

Section 508 of the Rehabilitation Act of 1973, Title 29 United States Code Section 794d 36, CFR, Part 1194 and 1194.4, *Electronic and Information Technology Accessibility Standards*, <https://www.access-board.gov/index.php>.

FAR; Part 39, *Acquisition of Information Technology, Subpart 39.2, Electronic and Information Technology*, current edition

Workforce Investment Act of 1998, Public Law 105-220

DoDD 5100.03, *Support of the Headquarters of Combatant and Subordinate Unified Commands*, 9 February 2011

DoDD 8000.01, *Management of the Department of Defense Information Enterprise (DODIE)*, 17 March 2016

DoDM 8400.01, *Accessibility of Information and Communications Technology (ICT)*, 14 November 2017

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

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

AFI 33-360, *Publications and Forms Management*, 1 December 2015

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—Air Force

AFI—Air Force Instruction

AFMAN—Air Force Manual

AFPD—Air Force Policy Directive

CFR—Code of Federal Regulations

CSS—Cascading Style Sheets

DoD—Department of Defense

FAR—Federal Acquisition Regulation

HTML—Hypertext Markup Language

U.S.—United States

USC—United States Code

Terms

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 Air Force. This includes any person responsible for building Air Force websites.

Electronic and Information Technology—Includes information technology and any equipment, or interconnected system of equipment used in the creation, conversion, or duplication of data or information. The term electronic and information technology includes, but is not limited to, telecommunications products (such as telephones), information kiosks, and transaction machines. Information technology does not include any equipment that contains embedded information technology 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. 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 <https://www.access-board.gov/index.php>) from the requirements of Section 508.

Information Technology—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 information technology or “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, and is synonymous with the term information system. *DoD 8000.01, 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 U.S. 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.

Statement of Work—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* define an undue burden as a significant difficulty or expense; see Title 36, Code of Federal Regulations, Part 1194.4, *Electronic and Information Technology Accessibility Standards and Federal Acquisition Regulations Part 39, Acquisition of Information Technology, Subpart 39.2, Electronic and Information Technology*. In determining whether acquiring electronic and information technology 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 electronic and information technology and provides technical assistance and training on these requirements and on accessible design. The Board’s electronic and information technology accessibility standards, set forth in Reference (d), have been incorporated into the *Federal Acquisition Regulations* and are located at <https://www.access-board.gov/index.php>. The Board also enforces physical accessibility standards that cover federally funded facilities.