

Administrative Change to SMCI 63-105, *AFSPC Section 508 Implementation Policy*

Replace the distribution list on page 6 with the following list.

Distribution:

- Chief Engineers Council (CEC)/SSAWG Chair
- SMC/EA (Engineering & Architecture)
- SMC/SY (Space Superiority Systems)
- SMC/WM (Defense Weather Systems)
- SMC/GP (GPS)
- SMC/SN (Satellite Control & Network Systems)
- SMC/MC (MILSATCOM)
- SMC/IS (Infrared Space Systems)
- SMC/LR (Launch & Range Systems)
- SMC/MD (Missile Defense Division)
- SMC/SD (Space Development & Test)
- SMC/SE (Directorate of Safety)
- SMC/SL (Space Logistics)
- SMC/XR (Development & Planning)
- Det-12 (Kirtland AFB)
- 526 ICBMSW (Hill AFB)
- 61st Communications Squadron
- AFSPC/XXX

These changes have not been integrated into the basic publication. The reader must use this IC in conjunction with the publication and these changes take precedence.

SUMMARY OF CHANGES

Insert the following text underneath the title of the template just above paragraph 1 of Attachment 5:

- Ref: (a) 29 U.S.C. § 794d ("Electronic and information Technology")
(b) FAR Subpart 39.2 ("Electronic and Information Technology")
(c) AFI33-393 ("Electronic and Information Technology Accessible to Individuals with Disabilities") 9 Jan 07
(d) SMCI63-105 ("AFSPC Section 508 Implementation Policy"), current version



**26 JANUARY 2007
Certified Current, 9 May 2019
Acquisition**

**AFSPC SECTION 508
IMPLEMENTATION POLICY**

COMPLIANCE WITH THIS PUBLICATION IS MANDATORY

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

RELEASABILITY : There are no releasability restrictions on this publication.

OPR: SMC/EAS/JAQ

Certified by: SMC/EA (Col James R. Horejsi)
Pages: 16

1. Introduction. Reference (a) requires Electronic and Information Technology (EIT) developed, procured, maintained, or used by the federal government be accessible to people with disabilities.
 - a. Electronic and Information Technology (EIT). EIT is defined as any system used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. This includes software applications and operating systems, web-based intranet and Internet information and systems, telecommunication products, video and multimedia products, self-contained or closed products, desktop and portable computers, and services (including support services).
 - b. Effective Date. Reference (b) required Federal agencies comply with the accessibility standards listed in reference (c) beginning 25 Jul 01.
 - c. Reasonable Accommodations. Nothing in this policy should be read to diminish AFSPC's responsibility for providing reasonable accommodations to qualified employees and applicants for employment who have disabilities under reference (d).
2. AFSPC Policy. AFSPC will develop, procure, maintain, and use EIT in accordance with Section 508.
3. Exceptions. EIT that meets one of the following exceptions is not required to comply with Section 508 accessibility standards per references (a), (b), and (c):
 - a. EIT for a National Security System (NSS), defined as the function, operation, or use of which involves:
 1. Intelligence activities.
 2. Cryptographic activities related to national security.
 3. Command & control of military forces.

4. Equipment that is an integral part of a weapon or weapon systems.
 5. A system that will not be used for routine administrative and business applications (including payroll, finance, logistics, and personnel management applications) and that is (a) critical to the direct fulfillment of military or intelligence missions or (b) protected at all times by procedures established for information that have been specifically authorized under criteria established by an Executive order or an Act of Congress to be kept classified in the interest of national defense or foreign policy.
 - b. EIT acquired by a contractor incidental to a contract, or which is neither used nor accessed by federal employees or members of the public.
 - c. EIT whose acquisition would require a fundamental alteration in the nature of the product or its components in order to comply with the Section 508 accessibility standards.
 - d. EIT that is located in spaces frequented only by service personnel for maintenance, repair or occasional monitoring.
 - e. It would impose an "undue burden" on the requiring organization to procure EIT that complies with Section 5084 accessibility standards.
 1. "Undue burden" is defined as a significant difficulty or expense.
 2. The organization shall consider available resources.
 3. Program managers shall document in writing the basis for an undue burden decision, provide that documentation to the Procuring Contract Officer (PCO), and propose an alternative means of access.
- 4. Legacy Systems and Contracts.** Section 508 does not apply to "legacy" systems and contracts (i.e., those in existence prior to 25 Jun 01) however, the following shall be Section 508 compliant if they contain EIT and no exception applies:
- a. Out of scope modifications to legacy contracts.
 - b. New contracts to modify or maintain legacy systems, unless they are for services only. Services such as help desk, training, and product support documentation shall be Section 508 compliant. In other words:
 1. New maintenance and support contracts on legacy systems do not require the legacy systems to be Section 508 compliant.
 2. New contracts for EIT related services, such as helpdesk, training, or product support, must be compliant with Subpart D of reference (c), titled Information, Documentation, and Support.
 3. EIT developed, procured, maintained, or used by a contractor to provide services (such as help desk support) to the government, does not have to be Section 508 compliant, per paragraph 3.b.
- 5. Web Sites.** New or modified AFSPC and SMC web sites shall be Section 508 compliant. A National Security Systems (NSS) exception shall not be applied to any publicly accessible AFSPC or SMC web site. Additionally, non-public web sites supporting excepted systems should comply whenever possible.

6. Responsibilities

- a. All AFSPC/SMC Procurement Officials. All personnel involved in the acquisition of EIT shall become familiar with Section 508. Specifically, Requiring Officials (i.e., program managers, department heads), Contracting Officials, and government EIT developers have a requirement to understand their responsibilities, Section 508 accessibility standards, and applicable FAR. Specific responsibilities are outlined below. The 508 accessibility standards, FAR changes, as well as training, are available on the web at <http://www.section508.gov>.
- b. AFSPC/SMC Requiring Officials. For all procurements, except those for which Section 508 does not apply (see paragraph 3.), Requiring Officials shall "certify" all procurements for Section 508 compliance by following the steps below. This task is generically referred to as EIT certification, and implies completing the EIT certification form referenced below.

1. EIT Certification Steps

- (a) Determine if a requirement includes EIT.
 - (b) If the requirement includes EIT, then determine which Section 508 accessibility standards apply and whether an exception applies.
 - (c) When considering commercial items, perform market research to determine if any of the applicable Section 508 accessibility standards are commercially unavailable.
 - (d) For EIT procurements that do not meet any exception, incorporate the applicable Section 508 accessibility standards into the specification and/or statement of work (SOW).
 - (e) Provide exception, commercial unavailability, or specifications/ SOW with incorporated Section 508 accessibility standards along with the Purchase Request (PR) to the Contracting Official.
2. Enclosures (1) through (4) are available on the AFSPC Section 508 web site to assist Requiring Officials in performing the tasks outlined above.
 3. Except for those procurements to which Section 508 does not apply (see paragraph 3.), Requiring Officials procuring EIT using non-AFSPC/SMC contracts (e.g., GSA contracts, Federal Supply Schedules, Government-Wide Acquisition Contracts (GWAC), multi-agency contracts (MAC) issued by other federal agencies) shall provide an EIT certification to the cognizant Ordering Officials. When procuring EIT that meets Section 508 accessibility standards, Requiring Officials shall not use any contract where the standards would exceed the contract scope.
 4. All AFSPC and SMC funding documents and task statements to other government activities shall include the following statement:

"Any Electronic and Information Technology developed, procured, maintained, or used by a government activity as a result of this tasking shall be done so in accordance with Section 508 of the Rehabilitation Act (29 U.S.C. 794d), as amended by the FY 2001 Military Construction Appropriation Act (Public Law 106-246 - 13 July 2000)."
 5. When practical, Requiring Officials shall include approved EIT certification in tasking to other government activities. Requiring Officials shall reference any applicable NSS designation or Undue Burden Exception Determination when tasking another government agency.

6. When acquiring commercial items, Requiring Officials must comply with those Section 508 accessibility standards that can be met with supplies or services that are available in the commercial marketplace in time to meet delivery requirements.
 7. Requiring Officials shall ensure that compliance with Section 508 is verified during source selection and contract performance (i.e., prior to acceptance). If necessary, compliance testing should be performed by the contractor and results provided for review by the accepting official. If products are commercially available which meet some but not all of the Section 508 accessibility standards, AFSPC & SMC shall procure the product that best meets the standards.
 8. The Section 508 Homepage for the Federal IT Accessibility Initiative (FITAI) contains information that can assist Requiring Officials in determining whether a commercial item is compliant with Section 508 at <http://www.section508.gov>. The Information Technology Industry Council (ITI) has developed a voluntary Internet-based template to help government and vendors identify products with features that support accessibility at http://www.itic.org/archives/articles/20040506/voluntary_product_accessibility_templatetm_vpattm.php
 9. Requiring Officials shall forward NSS determination requests and Undue Burden exception determinations to either AFSCP/XX or SMC/ACE Acquisition Support Office for processing.
- c. AFSPC and SMC Contracting Officials. Contracting Officials shall:
1. Implement Air Force procurement policies and directives consistent with the Federal Acquisition Regulations (FAR).
 2. Assist requiring activities with market research for Section 508 EIT that meets applicable Section 508 standards.
 3. Pursue effective acquisition strategies for acquiring EIT that meets applicable Section 508 standards.
 4. Promote Section 508 compliance at Government Purchase Card Training.
 5. Review Section 508 compliance based on standards at <http://www.section508.gov> as part of Government Purchase Card surveillance.
 6. Ensure that EIT certifications received from Requiring Officials are included in the contract file and Sections 508 standards are included into an Request for Proposal (RFP), contract or order for EIT (unless the EIT is designated as exempt from those standards).
- d. AFSPC and SMC Government EIT Developers. Government (as opposed to commercial) developers shall incorporate Section 508 accessibility standards into EIT they develop for federal use, unless an exception applies.
- e. AFSPC and SMC Web Site Owners. AFSPC and SMC Officials responsible for the production of web sites shall:
1. Determine 508 compliance for existing web sites.
 2. Bring principal sites into compliance as soon as possible.
 3. Bring all other sites into compliance as soon as practicable.

4. Ensure local web site administration procedures are updated to include Section 508 compliance testing.
5. Provide reasonable, alternate accommodation for web page information that may not be Section 508 compliant.
6. Include the following statement on all principal sites and any site that is not Section 508 compliant:

"We are continually working to ensure that this website is accessible to everyone. If you find a problem that prevents access, please contact us by sending an e-mail to XXX@peterson.af.mil or XXX@losangeles.af.mil. Information that cannot be accessed will be provided in an alternative format." ***** Need appropriate email addresses above.

7. The World Wide Web Consortium (W3C), through the W3C Web Accessibility Initiative (WAI), has published guidance for incorporating Section 508 accessibility standards into web sites at <http://www.w3.org/WAI/guid-tech.html>
8. Include the following statement and a handicapped symbol on all principal sites and any site that is Section 508 compliant: "This Air Force website and page is compliant with Section 508 standards as of (insert date)."

7. Approval Authority

- a. NSS Designations. NSS designations shall be approved by SAF/XC.
- b. Undue Burden Exception. Undue burden exception determinations shall be approved by SAF/XC.
- c. EIT Certification. For AFSPC/SMC, EIT certifications shall be approved at the Program Manager level or above. EIT certifications with an NSS or undue burden exception shall reference the approved NSS designation or include the approved undue burden exception determination accordingly. ACAT III/IV activities shall designate appropriate approval authority for EIT certifications; however, this shall not affect NSS designation and undue burden exception determination approval authority listed above.

Distribution:

- Chief Engineers Council (CEC)/SSAWG Chair
- SMC/EA
- SMC/SY (Space Superiority)
- SMC/WX (DMSP)
- SMC/GP (GPS)
- SMC/LG (Peterson AFB)
- SMC/SN (AFSCN)
- SMC/MC (MILSATCOM)
- SMC/IS (SBIRS)
- SMC/LR (Space Launch & Range Org)
- SMC/SE (System Safety)
- SMC/XR (Dev & Transformation)
- SMC/SB (Space-Based Radar)
- Det-12 (Kirtland AFB)
- 526 ICBMSW (Hill AFB)
- 61st Communications Squadron
- AFSPC/XXX

JAMES R. HOREJSI, Colonel, USAF
SMC Chief Engineer

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

- (a) Section 508 of the Rehabilitation Act (29 U.S.C. 794d), as amended by the FY 2001 Military Construction Appropriation Act (Public Law 106-246 of 13 Jul 00)
- (b) FAR Subpart 39.2
- (c) 36 CFR Part 1194 Section 508 Standards
- (d) Section 501 of the Rehabilitation Act of 1973
- (e) HQ AF/SCT memo of 11 Oct 00
- (f) HQ AF/SC memo of 20 Jul 01
- (g) AFPD 33-3, of 28 Mar 06

Abbreviations and Acronyms

ABW—Air Base Wing

ACE—Acquisition Center of Excellence

AFMC—Air Force Materiel Command

AFMC SSISSG—Air Force Materiel Command Software Intensive Software Support Group

AFOTEC—Air Force Operational Test and Evaluation Center

AFSPC—Air Force Space Command

AFSSG—Air Force Software Steering Group

AFSSIP—Air Force Software-Intensive Systems Strategic Improvement Program

AT&L—Acquisition, Technology, and Logistics

C3I—Command, Control, Communications, and Intelligence

CDR—Critical Design Review

CDRL—Contracts Data Requirements List

CMM—Capability Maturity Model

CMMI—Capability Maturity Model Integration

CMMI-AM—Capability Maturity Model Integration – Acquisition Model

COM—Computer Operation Manual

COTS—Commercial Off-The-Shelf

CPI—Critical Program Information

CPM—Computer Programming Manual

DAL—Data Accession List
DFAR—Defense Federal Acquisition Regulations Supplement
DID—Data Item Description
DoD—Department of Defense
DoDI—Department of Defense Instruction
EA—Engineering and Architecture Division
EAS—Engineering and Architecture Software Division
EIT—Electronic Information Technology
FFRDC—Federally Funded Research and Development Center
FSM—Firmware Support Manual
GOTS—Government Off-The-Shelf
HQAF—Headquarters Air Force
IA—International Affairs
IDD—Interface Design Description
IMP—Integrated Master Plan
IMS—Integrated Master Schedule
IRS—Interface Requirements Specification
IWSM—Integrated Weapons System Management
KDP—Key Decision Point
KPP—Key Performance Parameter
MCCR—Mission Critical Computer Resources
MSBP—Master Software Build Plan
NDAA—National Defense Authorization Act
OCD—Operational Concept Document
OSD—Office of the Secretary of Defense
PDR—Preliminary Design Review
PEO—Program Executive Officer
PMR—Program Management Review
PO—Program Office
PSAC—Plan for Software Aspects of Certification
RFP—Request For Proposal
RTCA—The organization that controls Federal Aviation Administration standards

SA-CMM—Software Acquisition - Capability Maturity Model
SAD—Software Architecture Document
SAF/AQ—Secretary of the Air Force / Acquisition
SAF/IA—Secretary of the Air Force / International Affairs
SAS—Software Accomplishment Summary
SDCE—Software Development Capability Evaluation
SDD—Software Design Description
SDP—Software Development Plan
SDR—System Design Review
SETA—System Engineering and Technical Assistance
SIP—Software Installation Plan
SISSG—Software Intensive Systems Steering Group
SLOC—Source Lines of Code
SMC—Space and Missile Systems Center
SMR—Software Metrics Report
SOO/SOW—Statement Of Objectives / Statement Of Work
SPO—Systems Program Office
SPR—Software Problem Report
SPS—Software Product Specification
SRDR—Software Resource Data Report (SRDR) need reference
SRR—System Requirements Review
SRS—Software Requirements Specification
SSDD—System/Subsystem Design Document
SSG—Software Steering Group
SSIVP—System/Subsystem Integration and Verification Plan
SSS—System/Subsystem Specification
SSTD—System/Subsystem Test Description
SSTP—System/Subsystem Test Plan
SSTP—System/Subsystem Test Report
STD—Software Test Description
STP—Software Test Plan
STR—Software Test Report

STrP—Software Transition Plan

STSC—Software Technology Support Center

SUM—Software Users Manual

SVD—Software Version Description

SW—Software

SWAIG—Software Acquisition Improvement Group

SWAMP—Software Acquisition Management Plan

SWAPI—Software Acquisition Process Improvement

TRR—Test Readiness Review

Attachment 2

**ND INFORMATION TECHNOLOGY
(EIT) CERTIFICATION**

PR#:	POC:	REQUIRING CODE:	TELEPHONE NO.
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REQUIREMENT MUST COMPLY WITH SECTION 508 - EIT ACCESSIBILITY STANDARDS

EIT is defined as any system that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information, including:

- Software applications and operating systems
- Web-based intranet and Internet information and systems
- Telecommunication products
- Video and multimedia products
- Self-contained or closed products
- Desktop and portable computers
- Related services (may include support services).

This requirement does not include EIT.

This requirement is for a commercially available EIT product that is

- fully compliant.
 not fully compliant (Complete and attach the EIT Commercial Non-Availability Form).

This requirement includes EIT and

- the applicable Section 508 Accessibility Standards (36 CFR Part 1194) have been incorporated into the attached SOW.
 meets one of the exceptions below - identify exception (Section 508, 36 CFR Part 1194, and FAR 39.204).
 The EIT supports a program or system designated as a National Security System.
 The EIT will be acquired by the contractor (non-government) incidental to this contract.
 A fundamental alteration to the nature of the required product or its components would be necessary to comply with Section 508 Accessibility Standards.
 The EIT will be located in spaces frequented only by service personnel for maintenance, repair or occasional monitoring of equipment.
 Compliance with Section 508 Accessibility Standards would impose an undue burden on the agency (Complete and attach the Undue Burden Exception Determination Form).

 Author (print name)

 For AFSPC HQ/SMC:

 Program Manager (print name)

For AFSPC/SMC Activity:

Check with Contracting Official for local Approval authority (print name)

 Signature (sign)

 Signature (sign)

Attachment 3

EIT COMMERCIAL NON-AVAILABILITY CERTIFICATION FORM

To be completed by the Requiring Official and provided to the Contracting Official with the EIT Certification Form.

Even if not fully compliant, AFSPC shall acquire the commercial product that provides the greatest degree of compliance with the Section 508 Technical Standards while satisfying other functional requirements. (36 CFR subpart 1194.2 (b)).

Enclosure:

- (1) FAR Commercial Item Definition
- (2) Section 508 Definitions and Technical Standards

1. Describe the commercial item, see enclosure (1), and site the applicable technical standards, see enclosure (2).

2. Describe the market research used to ascertain the non-availability of compliant commercial items.

Possible references: Request-for-information (RFI) in Federal Business Opportunities, consultation with industry, trade associations, Internet, other federal agencies, or accessible product organizations such as the IRS Information Resources Accessibility Program (IRAP) and General Services Administration (GSA) Center for Information Technology (IT) Accommodation; GSA's Federal Supply Service; IRS Disabled Employees Support Acquisitions Contract (DESAC II).

3. Summarize findings on the non-availability of compliant commercial items including the applicable technical standards that are not met by available commercial items.

I have determined that a commercial product that meets all of the applicable Section 508 Technical Standards as well as the requirements of this procurement is not available in the commercial marketplace, nor expected to become available in time to satisfy delivery requirements.

Author	Signature	Date
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For AFSPC/SMC: Program Manager	Signature	Date
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For AFSPC/SMC Activities:
Check with Contracting Official for local approval authority

Attachment 4**EIT UNDUE BURDEN EXCEPTION DETERMINATION FORM**

To be completed by the Requiring Official and provided to the Contracting Official with the EIT Certification Form.

Provide information below to justify your determination that compliance with Section 508 Accessibility Standards (36 CFR Part 1194) for the required EIT imposes an undue burden on your activity. A thorough explanation is necessary because it may be used to protect your activity against protests and litigation. Relevant attachments are encouraged.

1. Products or services required to meet the agency's needs:

2. Dollar value of the acquisition, including any options:

3. Applicable Section 508 standards (see 36 CFR part 1194) that are unmet:

4. Market research performed to locate commercial items that meet the applicable standards:

5. The undue burden (i.e. the significant difficulty or expense the Government would incur in order to comply with a particular standard). If the monetary expense is deemed prohibitive, explain the costs and how they were estimated.
 - a. Significant difficulty of compliance:

 - b. Significant expense of compliance:

 - c. Insufficient agency resources available to the agency's program or component for which the goods or service is being acquired:

Attachment 5**NATIONAL SECURITY SYSTEM (NSS) INFORMATION
TECHNOLOGY (IT) DETERMINATION REQUEST FOR
(PROGRAM NAME AND NOMENCLATURE)****1. PROGRAM NAME, NOMENCLATURE, AND ACAT DESIGNATION:****2. PROGRAM POINT OF CONTACT** (Name, Code, Phone, E-mail address):

3. DESCRIPTION OF SYSTEM OR TECHNOLOGY (Focus on functional use or purpose of IT resources being acquired for the military or intelligence mission and describe how that mission satisfies one or more of the categories identified in paragraph 4):

4. NSS DESIGNATION INFORMATION:

In accordance with references (a) through (d), the system or technology listed above meets the criteria for an NSS as follows: (check all that apply)

- (a) Involves intelligence activities
- (b) Involves cryptologic activities related to national security
- (c) Involves command and control of military forces
- (d) Involves equipment that is an integral part of a weapons system
- (e) Will not be used for routine administrative and business applications (including payroll, finance, logistics, and personnel management applications) and that is (i) critical to the direct fulfillment of military or intelligence missions or (ii) protected at all times by procedures established for information that have been specifically authorized under criteria established by an Executive order or an Act of Congress to be kept classified in the interest of national defense or foreign policy.

5. APPROVAL:

Lieutenant General XXXXXXXX

Date

SAF/XC

Attachment 6

INSTRUCTIONS FOR FILLING OUT PARAGRAPH 3 OF NSS DETERMINATION FORM

Paragraph 3 should provide a detailed description in layman's terms of what the system does; use of technical terminology (e.g., describing that the system operates in a specific MHz bandwidth) is discouraged. Particular attention should be paid to identifying specific types of information transmitted and/or received by the system.

For example, if paragraph 4(a) is checked, the description in paragraph 3 should provide specific examples of the types of evaluation information concerning an enemy or possible enemy (e.g., forces, weapons, capabilities, intentions) or a possible theater of operations and the conclusions drawn there from (e.g., bomb damage assessments) -- for that is the generally-understood definition of the term "intelligence" -- that the proposed system receives/transmits.

If paragraph 4(b) is checked, the description in paragraph 3 should provide specific examples of how the proposed system transmits/receives hidden, disguised or encrypted communications -- for that is the Defense Department's definition of the term "cryptologic," Joint Publication 1-02; AFDIR 33-303. It is not required that the system itself encrypts and/or decrypts data -- but if it does so, that fact should be stated.

If paragraph 4(c) is checked, the description in paragraph 3 should provide specific examples of the types of information transmitted/received that directly assists the movement of men or material (e.g., air tasking orders) — for that is the generally-understood definition of "command and control."

If paragraph 4(d) is checked, the description in paragraph 3 should (1) identify the specific weapons system(s) that the proposed system is "integral" to, and (2) what would happen to that/those specific weapons system(s) if the proposed system would fail. Note that the dictionary definition of the word "integral" means "essential."

Since the word 'critical' in paragraph 4(e) is synonymous with the terms 'crucial' or 'indispensable,' if that box is checked for the reasons described in 4(e)(i), the description in paragraph 3 should (1) state whether any backup systems exist to the proposed system, and (2) the specific military or intelligence mission the proposed system will directly fulfill. If the program office believes that a specific military or intelligence mission has been mandated by Congress, the requester should identify specific sections in the pertinent authorization/appropriations acts and/or specific language in House, Senate, or Conference Committee reports to support that belief. If that box is checked for the reasons described in 4(e)(ii), the description in paragraph 3 should explain why that is the case (e.g., cite to the system's/program's Security Classification Guide).

Note that the word "involves" is included in paragraphs 4(a)-(d) and the word "direct" is used in paragraph 4(e). Conceivably, virtually everything DoD does bears some relationship, however remote to, e.g., the command and control of military forces, intelligence activities, etc. In this context, however, what the word "involves" or "direct" means is that there must be a very close relationship between the proposed system and, e.g., the command/control of military forces.