



STANDARD OPERATING PROCEDURE

Number	Date	Organization
NTED 2020-02	3/12/2020	TPP

National Training and Education Division Testing and Verification for Section 508 Compliance

I. Purpose

The purpose of this Standard Operating Procedure (SOP) for the National Training and Education Division (NTED) Headquarters (HQ) Training Partners Program (TPP) testing and verification for Section 508 compliance is to provide guidance to NTED HQ TPP staff and training partners regarding the process for testing and verifying that materials meet accessibility standards. This SOP also outlines the roles and responsibilities for testing and verifying that course materials developed using Department of Homeland Security (DHS) Federal Emergency Management Agency (FEMA) grant funds meet Section 508 requirements.

II. Scope

This document is applicable to the recipients of all cooperative agreements, interagency agreements and contracts managed by NTED HQ TPP staff.

III. Background

- a. Section 508 amends the Rehabilitation Act of 1973 to ensure that electronic information and technology is accessible to federal employees and members of the public with disabilities. Anytime a government agency “develops, procures, maintains, or uses” electronic and information technology (EIT), also known as information and communications technology (ICT), the information and data must be available in a way that meets federal standards that enable persons with disabilities to access it. Conformance with these standards is mandated by [Section 508 of the Rehabilitation Act](#).
- b. NTED HQ TPP provides tailored training that enhances the capacity of state and local jurisdictions to prepare for, protect against, respond to, recover from, and mitigate all hazards. Just as the information presented in training developed under this program needs to conform to nationally recognized standards, any learning management, learning content, content management systems, browser or computer-based training products themselves must be accessible to users with disabilities by meeting the requirements outlined in Section 508 of the Rehabilitation Act of 1973.
- c. DHS defines a process for testing software products, web-based materials, and documents to ensure their conformance with Section 508 requirements. This *Trusted Tester* program helps to promote a common understanding of the Section 508 standards; unifies test processes, tools, and results reporting; and improves the ability of developers to remediate conformance issues.

IV. Authority

- Section 508 of the Rehabilitation Act (29 U.S.C. 794d), as amended by the Workforce Investment Act of 1998 (P.L. 105-220), August 7, 1998
- Architectural and Transportation Barriers Compliance Board Electronic and Information Technology (EIT) Accessibility Standards (36 C.F.R. Part 1194)
- Public Law 107-347, “The E-Government Act of 2002,” Section 202(d), “Accessibility to Persons with Disabilities”
- Title 29, U.S.C., Section 794d. “Electronic and Information Technology”
- Title 36, CFR, Part 1194, “Information and Communication Technology Accessibility Standards”

V. Training Partner Responsibilities

- a. When directed by the TPP Program Manager (PM), the Training Partner submits the course materials to the Contractor; because course files are typically too large for email, the Training Partner should make the files available via file transfer protocol (FTP), direct download, or other file sharing method. Training Partners provide all electronic files associated with the course package. To ensure clear communication regarding which files are submitted and received, the Training Partner includes a completed copy of the TPP Course Package Inventory form detailing all files submitted as part of the course package. Once the files, or a link to the files, has been sent to the Contractor, the Training Partner notifies the TPP PM.
 - i Files submitted for testing are the final files used for course delivery.¹
- b. If no nonconformances are identified by the testing, a Compliance Determination Form (CDF) is prepared by the Contractor and approved by the TPP PM.
 - i The Training Partner acknowledges receipt of the reports provided by the Contractor.
- c. If nonconformances are found as a result of the testing, the Training Partner receives a report from the Contractor detailing the results of the testing, including a summary document reporting the compliance status of each file tested and the type of noncompliance identified. Neither the report, nor any other communications from the Contractor shall be construed as a directive to the Training Partner regarding the approach for correcting nonconformances.
 - i The Training Partner acknowledges receipt of the reports received from the Contractor.
- d. The Training Partner reviews the report and determines if the necessary revisions can be made using available software tools and features.

¹ Once a file has been tested and certified as Section 508 conformant, any alterations to the file may impact its accessibility; conformant files can be copied and distributed as needed but cannot be compiled with other files into a new file, split into separate files, or otherwise edited or altered without requiring a new test for Section 508 conformance.

- i If revisions can be made using current software, the Training Partner makes all necessary revisions to correct nonconformances within six weeks (i.e., 30 business days) of receipt of the report.
 - ii If the software used to develop course materials does not support the remediation of conformance errors, the Training Partner will work with their TPP PM to develop a remediation plan that addresses the steps taken in attempting to correct the errors, strategies to mitigate to the extent possible, any impacts on accessibility, and a plan to implement changes or updates made by the software developer when possible.
 - iii The Training Partner has two weeks (i.e., 10 business days) from receipt of the report to ask questions and/or seek clarification from the Contractor.
- e. After the nonconformances have been addressed, the Training Partner resubmits the course materials, an updated Course Package Inventory form, and the remediation plan, if applicable, to the Contractor, notifies the TPP PM, and the testing process is repeated.

VI. Training Partners Program, Program Manager Responsibilities

- a. The TPP PM directs the Training Partner to submit course files and the completed course package inventory to the Contractor for testing once required reviews (TPP PM and Instructional System Design Specialist) are complete and course materials are finalized.
 - i The TPP PM copies the Contractor on the email to the Training Partner
- b. The TPP PM receives a testing report from the contractor once testing is complete.
- c. If the testing identifies any nonconformances, the TPP PM discusses the test results with the Training Partner and the Training Partner determines the desired approach for remediation of identified nonconformance(s).
 - i If the software used to develop course materials does not support the remediation of conformance errors, the TPP PM works with the Training Partner to develop a remediation plan.

VII. Contractor Responsibilities

- a. The Contractor receives the course materials and the TPP Course Package Inventory form from the Training Partner, if applicable, and confirms that all files listed on the inventory form are included in the course materials package. The Contractor notifies the Training Partner to verify that all course materials were received or make arrangements to obtain the missing materials if needed. The Contractor copies the TPP PM on the communications. All course materials submitted to the Contractor and listed on the TPP Course Package Inventory form will be tested. Once received, they are tested by a certified DHS Trusted Tester, version 3, using the designated methods and tools. Each component of the course materials is examined individually and addressed in the reporting process.
- b. Courses will be assigned to a Trusted Tester when they are received for initial review. That course will be reviewed by the same Trusted Tester throughout the lifecycle of the review process, unless otherwise not feasible due to emergency or other unforeseen circumstances.

- c. The Contractor is allocated six weeks (i.e., 30 business days) from the date of the confirmed receipt of the course materials package to conduct the initial full review of all course materials and the subsequent follow-up reviews. Once testing is complete, the results for each component of the training package are submitted.
 - i If nonconformances are identified, the Contractor will provide the results of the testing to the TPP PM and the Training Partner.
 - 1 Once remediated course materials are submitted, a second review is conducted to confirm that all conformance errors were successfully remediated, and that no additional errors were introduced during the process of remediation.
 - ii If the Training Partner submits a remediation plan the Contractor reviews the course materials and the remediation plan to confirm that the package is complete and fully addresses the issue(s).
 - iii If no conformance errors are identified the contractor prepares a CDF indicating that the course materials conform to accessibility requirements; the CDF is forwarded to the NTED COR for approval.

VIII. NTED Contracting Officer's Representative (COR) Responsibilities

- a. The COR approves the CDF once it is issued by the Contractor.
- b. The COR forwards the signed CDF to the TPP PM.

IX. Timeline

- a. The table below shows the timeframes associated with each step of the Section 508 testing process. Times are given in business days.

	Desk/Online Review	Course Delivery/Instructor Audit	Onsite Review
TPP PM and ISD complete review and direct TP to submit course materials for Section 508 review	14	14	14
Contractor conducts Section 508 review and provides results to TPP PM and TP; when results indicate course materials are compliant, Contractor issues a Certificate of Compliance	30	30	30
The Training Partner has 10 business days from receipt of the report to ask questions or seek clarification	10	10	10
NTED COR approves the Certificate of Compliance and forwards the signed form to the TPP PM	7	7	7

TPP PM

Contractor

NTED COR

X. Process Flow Diagram

