



ICT Conformance Risk in a Life Cycle

→ Drivers of Digital Accessibility

Accessibility is the law and must be embraced. This guidance assists with determining the probability of accessibility conformance throughout a project life cycle. Notable drivers of conformant ICT include reducing legal risk to the Department; reducing time, cost, and rework of incorporating accessibility; and improving user interactions and experience

→ Engagement of Stakeholders

Multiple roles are responsible for ensuring content incorporates and maintains an acceptable level of conformance throughout the life of a project.

Role	Responsibilities
Acquisition	<ul style="list-style-type: none"> COs: Ensure acquisitions include appropriate Section 508 language, collect ACRs as part of the acquisition process, and ensure a Section 508 determination is made during the acquisition process CORs: Accept deliverables after proof of conformance is provided ITAR: Ensure Section 508 is a critical partner
Governance	<ul style="list-style-type: none"> Governing bodies: Include accessibility milestones from the beginning throughout the project life cycle to reduce cost and increase efficiency Governing bodies - ATO: Confirm a project or system has achieved an accessibility clearance to proceed through the life cycle
Developers / Content Authors	<ul style="list-style-type: none"> Project or System Teams: Include accessibility at the beginning and throughout the project life cycle to reduce cost and increase efficiency. Project or System Teams: Ensure ICT development includes accessibility standards and is implemented in an accessible manner. Project or System Teams: Confirm content conforms to HHS & OS accessibility requirements before deployment or distribution.

→ Calculating the Risk and Impact of Life Cycle Accessibility Conformance

To properly assess the overall risk of a product or service parameters must be defined.

Probability of Non-Conformance is the calculated average of the individual Risk Levels. It serves as a summary value of risk the project places on the Department.

Risk Level uses Severity and Engagement to calculate a value of **Low**, **Moderate**, **High**, or **Very Risky**. The value is used to quantify a risk level and identify needed changes by step.

Engagement is the amount in which accessibility is incorporated into a life cycle step.



Exclude: Does not include or consider accessibility

Acknowledge: Checks a box

Guidance: Seek out information from an authoritative source

Collaborate: Interact with authoritative source to make specific ICT decisions

Embed: Accessibility drives decisions



Severity is the level of impact in which accessibility affects a life cycle step.

- **Negligible:** Full control of code or document output.
- **Moderate:** Layout and design choices are available, but ultimately the underlying (programmatic) output can not be manipulated (i.e. template with fixed parameters).
- **Critical:** Low code (minimal manipulation) options for the output; no access to source code or document.
- **Catastrophic:** Contains documented accessibility defects; no code manipulation is available; no access to source code or document; content is locked or not editable; document(s) contain signature(s)

Calculator

Select a value from Severity and Engagement to calculate the risk level and overall probability.

Life Cycle Step	Severity	Engagement	Risk Level
Market Research			
Project Requirements			
Language in SOO/SOW/PWS			
ACR Collected			
SME on TEP			
Accessibility Post-Award Milestones			

Probability of Non-Conformance:

→ How to Improve Each Life Cycle Step

The steps below show what can be done to increase engagement beyond exclusion.

Market Research

- **Acknowledge** that accessibility is a requirement and therefore accessibility must be considered when assessing tools or services.
- **Guidance** is gained when independent research is conducted to determine the accessibility claims of the tools that meet the business need.
- **Collaborate** with the Accessibility Program to determine the most accessible option.
- **Embed** the Accessibility Program to test the different offerings and provide a recommendation.

Project Requirements

- **Acknowledge** that accessibility is a requirement and therefore accessibility must be considered when developing requirements for tools or services.
- **Guidance** is gained when independent research is conducted to determine what accessibility properties are available in the tools being used to meet the business need and how to design accessible features.
- **Collaborate** with the Accessibility Program to receive recommendations on the most accessible implementation of the project requirements.
- **Embed** the Accessibility Program to provide specific recommendations based on the business need to ensure the highest level of compliance.



Language in SOO/SOW/PWS

- **Acknowledge** that accessibility is a requirement, but the necessary language to include is unknown.
- **Guidance** was obtained by inserting the standard ITAR language
- **Collaborate** with the Accessibility Program to determine all areas in which have accessibility implications.
- **Embed** the Accessibility Program to provide specific information to the COR and PM to schedule and accept accessible material.

ACR Collected

- **Acknowledge** that an ACR should be collected.
- **Guidance** is obtained by independent research of what an ACR is and how typical responses appear.
- **Collaborate** with the Accessibility Program to determine what an ACR contains and how to interpret one.
- **Embed** the Accessibility Program to provide specific guidance on how to respond to a vendor's ACR (i.e. ask if the product can be modified).

SME on TEP

- **Acknowledge** that accessibility must be measured during the evaluation of offerors.
- **Guidance** is obtained by independent review of the ACR responses from the offerors.
- **Collaborate** with the Accessibility Program to determine the state of the ACRs provided.
- **Embed** the Accessibility Program to serve as an TEP evaluator.

Accessibility Post-Award Milestones

- **Acknowledge** that accessibility needs to, at a minimum, be fully tested at the end.
- **Guidance** is obtained by independent research and review of the accessibility impacts of each functional release
- **Collaborate** with the Accessibility Program to test the final product
- **Embed** an expert from the Accessibility Program into the development team.

➔ Resources

For further guidance and assistance, it is recommended stakeholders review available resources.

- [HHS Accessibility Checklists](#) – Defines the elements that must be addressed to confirm conformance and provides a template for reporting of defects.
- [OS Training Resources](#) – Provides topic-specific steps on how to ensure conformance.
 - [Acquisition Guidance on the VPATs® and Accessibility Conformance Reports \(ACR\)](#) – Targets vendors navigating through the government acquisition process and provides helpful information about what is sufficient in an ACR.
- [GSA's Acquisition Requirements Tool \(ART\)](#) – Assists entities with determining the requirements of various aspects of acquisitions.