

# ***Social Security Administration***

## ***Agency Comments on Docket #ATBCB-2015-0002, Information and Communication Technology (ICT) Standards and Guidelines***

### ***PDF/UA Standard***

We appreciate the addition of PDF/UA as a referenced standard because it is more explicit and will bring better consistency to document conversion engines and automated Enterprise compliance scanning tools. We also appreciate that the reference to PDF/UA is optional. We urge the US Access Board to clarify that PDF/UA is optional whenever it is referenced.

The PDF/UA format is not easy for subject matter experts to work with, is copyright protected, and has nearly a hundred references to ISO 32000 (the original PDF ISO standard). These difficulties aside, the most important reason to sustain PDF/UA as an optional standard is to ensure agencies have the option for a single set of standards that apply to ALL electronic content covered by E205.3: Agency Official Communication. The US Access Board should not burden the agencies with a list of multiple standards to apply based on file type. The WCAG guidelines are sufficient to communicate accessibility conformance, and the WCAG2ICT task force has bridged gaps between web content and electronic content.

### ***Real Time Text***

We appreciate the explanation provided in the NPRM preamble on Real Time Text (RTT), but we are concerned about some remaining ambiguities surrounding the proposed requirement. The requirements in 410.6 discuss “compatibility” with RTT, but do expose that an agency has the choice to not enable the RTT features. We agree that ICT procurements and deployed infrastructure should be compatible with RTT, but the final rule should not confuse the public or Federal employees that RTT must be enabled even when a particular use case makes it a security, legal, or business risk. We advise the USAB to provide clarity in the final rule that RTT compatibility is the maximum the standards requires and that an agency has full discretion on enabling the actual functionality of RTT.

### ***Electronic Content Categories***

In the major issues section of the NPRM, the US Access Board indicated that they aimed to bring needed clarity to the scope of electronic content subject to accessibility requirements in the 508 Standards, and that without this clarity in the existing standards “Agencies have been reluctant to apply the existing 508 Standards to electronic information and data, except for Web pages.” The Board further explains they intend to limit the scope of covered content to when such content (a) constitutes agency official business, and (b) falls within one or more of eight categories of

communication, including: (1) emergency notifications (e.g., an evacuation announcement in response to fires or other emergencies); (2) initial or final decisions adjudicating administrative claims or proceedings; (3) internal or external program or policy announcements (i.e., information promulgated by an agency relating to programs it offers or policy areas it deals with); (4) notices of benefits, program eligibility, employment opportunities or personnel actions; (5) formal acknowledgements or receipts (i.e., official replies by an agency that recognize the receipt of a communication); (6) questionnaires or surveys; (7) templates or forms; and (8) educational or training materials.

The Social Security Administration recognizes the need to support a productive workforce that is inclusive of employees with the many types of disabilities covered by the Section 508 standards. The Social Security Administration also recognizes the breadth of electronic content used by employees with disabilities to perform their daily work activities, and the critical need to ensure they have full access to this content. The Social Security Administration also understands the potentially significant accommodation costs that would be required under Section 501 of the Rehabilitation Act when employees are not provided full access to this content.

In the discussion of major issues, the Board stated that by “limiting the scope of covered electronic content to these proposed eight categories of official communications, the Board intends to encourage agencies to do more to ensure that individuals with disabilities have comparable access to, and use of, electronic information and data. However, the introduction of the eight categories we fear may have the opposite effect of encouraging agencies to do less, not more. This is particularly evident in the area of informational web pages deployed internally to agency employees, which for the most part would now be excluded from the scope of the Section 508 standards. Whereas the eight electronic content scoping provisions are useful limiters for electronic documents and multi-media content, they are far too restrictive informational web pages (e.g. html pages).

In the discussion of major issues, the Board asked under Question 5 “should a category for “widely disseminated” electronic content be included among the categories of non-public facing official communications by agencies that must meet the accessibility requirements in the 508 Standards? Why or why not? If such a category were to be included in the final rule, what metrics might be used to determine whether a communication is broadly disseminated throughout an agency?”

The Social Security Administration believes a term similar to “widely disseminated” electronic content should be included in the scoping section.

Specifically, in keeping with the goals of the Board to limit the scope to the most important electronic content, we recommend adding a ninth content category item to the list: "internal web pages". If necessary, the Board may also consider adding an advisory note stating the "internal web pages" does not apply to all electronic documents and multi-media content posted to these pages (which are already adequately scoped by the eight categories proposed by the Board). This would preserve the current well-established practice of applying the Section 508 standards to internal web pages.

In addition, this approach would eliminate three costly and difficult implementation challenges introduced by the eight-category approach: (1) how to create and maintain an enterprise system to categorize all internal web pages by the eight content categories, (2) how to ensure disabled employees can navigate to web pages that include content covered by the eight categories, and (3) how to ensure disabled employees have an integrated accessible experience across internal websites. By clarifying that internal websites are covered under the new standards, webmasters can continue to focus on making web pages accessible, as they have since the standards were introduced in 2001, and agencies can focus their improvement efforts on the relatively narrow scope of the eight categories for multi-media and electronic documents distributed on the web and through other means.

Furthermore, adding this language (scoped for internal web pages only) would actually be easier to implement than the current approach. It is far more manageable for agency executives to identify which internal web domains must contain accessible web pages, than it would be to try to systematically discern which individual internal web pages meet one or more of the eight categories, define how employees with disabilities would navigate to these pages, and address the significant usability concerns of such a piecemeal approach to supporting accessibility.

In addition, clarifying the application to internal web pages, in conjunction with official communications scoping language, would also support the Social Security Administration's current plans to implement a comprehensive Section 508 governance framework across the agency.