

**FISH AND WILDLIFE SERVICE  
INFORMATION RESOURCES MANAGEMENT**

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**OVERVIEW**

**5.1 What is the purpose of this chapter?** This chapter:

**A.** Establishes U.S. Fish and Wildlife Service (Service) policy to ensure our Regions and programs are procuring Information and Communication Technology (ICT) that is compliant with Section 508 of the Rehabilitation Act of 1973, as amended;

**B.** Establishes processes to ensure our employees, volunteers, contractors, and visitors with disabilities have access to ICT comparable to what we provide to individuals without disabilities; and

**C.** Describes the roles and responsibilities for implementing Section 508 as it relates to Service procurements.

**5.2 What are the Service’s goals for procurements?** Our goals are to:

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**A.** Comply with applicable Federal, Department of the Interior (Department), and Service standards, policies, and regulations for ensuring that ICT procurements address Section 508 requirements to improve the productivity, efficiency, and effectiveness of our programs by eliminating barriers to electronic and information technology; and

**B.** Establish clear roles and responsibilities for ensuring Section 508 requirements are considered during the development, procurement, and maintenance of ICT products and deliverables.

**5.3 What are the authorities and terms you need to know to understand this chapter?** See 270 FW 4 for a list of authorities and terms you need to know for the two Service Manual chapters on Section 508 compliance—270 FW 4 and 270 FW 5. There is also a brief description of the history and reason for Section 508 of the Rehabilitation Act in that chapter.

**OVERALL RESPONSIBILITIES**

**5.4 Who is responsible for ensuring Section 508 requirements are included in ICT procurements?** Anyone involved in any part of the procurement process, from the person who identifies that a product or service is needed to the Contracting Officer who awards a contract, has a responsibility for ensuring Section 508 requirements are included as part of the procurement.

**A.** Table 5-1 describes the high-level responsibilities for implementing the procurement aspect of the Section 508 program. There are more detailed descriptions of individuals' responsibilities in sections 5.5 through 5.8.

**Table 5-1: Responsibilities for Section 508 compliance for procurement**

These employees...	Are responsible for...
<b>(1) Director</b>	Ensuring we have a program in place so that ICT procurements include Section 508 requirements.
<b>(2) Directorate members</b>	Ensuring that the programs and field stations in their areas of responsibility follow the requirements in this policy.
<b>(3) Associate Chief Information Officer (ACIO) for the Service, i.e., the Assistant Director – Information Resources and Technology Management (IRTM)</b>	<b>(a)</b> Developing this policy and keeping it up-to-date, and  <b>(b)</b> Working with Regions and programs to ensure they are complying with this policy.
<b>(4) Chief, Office of Diversity and Inclusive Workforce Management (ODIWM)</b>	Working with IRTM to ensure the Regions and programs are complying with this policy.

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These employees...	Are responsible for...
<b>(5) Headquarters (HQ) and Regional Chiefs, Division of Contracting and General Services</b>	Ensuring Contracting Officers and other procurement staff understand Section 508 requirements so they incorporate those requirements into contracting and procurement requests.
<b>(6) Service, Regional, and Program Section 508 Coordinators</b> (see 270 FW 4 for more information)	<p><b>(a)</b> Assisting staff to ensure Section 508 compliance is effectively incorporated with their Regions'/programs' procurement processes, including solicitation requirements, contract language, testing, and acceptance; and</p> <p><b>(b)</b> Assisting Requiring Officials with exception requests (e.g., undue burden exception).</p>
<b>(7) Requiring Officials</b> (also see section 5.5)	Working with Regional or program Chief Technology Officers or designated Information Technology (IT) staff and Contracting Officers to ensure Section 508 requirements are adequately addressed during the ICT procurement and delivery process.
<b>(8) Regional or Program Chief Technology Officers (CTOs)</b> (also see section 5.7)	Working with Requiring Officials to ensure appropriate Section 508 requirements are identified and documented in the Financial and Business Management System (FBMS) ICT purchase requests and for credit card purchases.
<b>(9) Contracting Officers (COs)</b> (also see section 5.8)	<p><b>(a)</b> Working with Requiring Officials and the acquisition team to conduct market research, ensure procurements address Section 508 requirements, and fulfill the Federal Acquisition Regulation (FAR) requirements at FAR 11.002(f) and 39.2;</p> <p><b>(b)</b> Ensuring there is competition and that the contracting file includes a record of actions and decisions;</p> <p><b>(c)</b> Awarding contracts and orders in compliance with procurement standards (see Part 301 of the Service Manual); and</p> <p><b>(d)</b> Ensuring deliverables meet accessibility standards.</p>

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These employees...	Are responsible for...
<b>(10) Contracting Officers' Representatives (CORs)</b>	<p><b>(a)</b> Working with Requiring Officials to help them develop Statements of Work (SOW),</p> <p><b>(b)</b> Ensuring SOWs include appropriate Section 508 accessibility standards,</p> <p><b>(c)</b> Verifying products or services meet the standards required in SOWs, and</p> <p><b>(d)</b> Managing contracts after they are awarded.</p>
<b>(11) ICT System Developers and Project Managers</b>	<p><b>(a)</b> Identifying applicable Section 508 requirements for their systems or investments, and</p> <p><b>(b)</b> Ensuring requirements are included throughout the acquisition and IT life cycles (i.e., planning, development, testing, and deployment).</p>

**B.** The OMB “Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act” establishes detailed responsibilities that Federal agencies must meet to comply with Section 508. Sections 5.5 through 5.8 below provide more information about how several of the officials we describe in the table above help the Service to comply with Section 508.

## REQUIRING OFFICIALS

### **5.5 Who is the Requiring Official, and what are the requirements OMB has placed on him/her related to Section 508?**

**A.** As soon as you decide you want to procure something related to ICT, regardless of your grade level or position description, you become the Requiring Official. Requiring Officials represent the actual customer side—they “own” the need that will be met by the service or product procurement.

**B.** As a Requiring Official, you need knowledge and understanding of Section 508 standards because you are ultimately responsible for identifying (often with the help of others) what Section 508 requirements apply to the procurement and for developing and maintaining required documentation, such as the Government Product/Service Accessibility Template (GPAT) and the 508 solicitation language, that is included in the procurement package.

**C.** OMB mandates that Requiring Officials include appropriate Section 508 accessibility standards in acquisition planning and requirement documents.

**(1)** To meet OMB’s expectations, you must determine:

- (a)** Your need (i.e., product or service that you want to procure),
- (b)** The Section 508 relevance and any exceptions, and

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(c) The specific Section 508 technical and performance requirements.

(2) The General Services Administration (GSA) hosts an online tool ([buyaccessible.gov](http://buyaccessible.gov)) that will help you to identify which standards apply to the procurement. It also generates a GPAT and recommended 508 solicitation language. Another useful resource is the [United States Access Board's Electronic Information Technology accessibility standards](#) in 36 CFR Part 1194.

D. With assistance from the CTO and Contracting staff, you must conduct research on accessibility of commercially available ICT, which will help you to develop technical specifications and minimum requirements. You must submit this information with any FBMS purchase request and keep it as backup for any credit card purchase. If a solicitation is required for the procurement, you are responsible for including the solicitation language relevant to Section 508 as part of the procurement documentation.

E. As the Requiring Official, you are also responsible for ensuring solicitation documentation is accessible. Scanned solicitation documents, for example, are not accessible to someone who has to use a screen reader such as JAWS. Instructions on making documents accessible are available on [GSA's Section 508 website](#).

F. Depending on the complexity of the requirement, you may need to help Contracting staff select evaluation criteria. You may also need to participate in source selection and inspect or evaluate products and services. Each Region and program office must develop an internal process to ensure the Contracting office is kept informed about the inspection and receiving status of deliverables.

**5.6 What other Service employees can help the Requiring Official determine and work with Section 508 requirements?** In addition to GSA's online accessibility tool ( which is available at <http://buyaccessible.gov/>), the employees in Table 5-2 can help you as you work to comply with Section 508.

**Table 5-2: Employees who can help the Requiring Official**

These employees...	Can help you...
IT Specialists (e.g., your Region's/program's CTO or Regional Help Desks)	Identify 508 applicability and accessibility requirements.
IT Testing Specialists	Identify inspection and acceptance criteria for deliverables, develop test plans, and conduct delivery inspection, testing, and acceptance.
Program management officials	Determine proposal evaluation factors.
Section 508 Coordinators (i.e., your Regional or Program Section 508 Coordinator)	Identify Section 508 applicability and accessibility requirements for unique ICT purchases and assist with testing plans.
COs	Ensure that accessibility requirements, inspection and

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These employees...	Can help you...
	acceptance criteria, and evaluation factors are appropriately represented in the solicitation.

## **CHIEF TECHNOLOGY OFFICERS**

### **5.7 What are the requirements OMB has placed on the Service’s CTOs?**

**A.** OMB requires that agencies’ IT Specialists work with the Requiring Official to identify Section 508 applicability and accessibility requirements and to help develop inspection and acceptance criteria for deliverables.

**B.** In the Service, this “IT Specialist” responsibility rests with our CTOs. The Regional or program CTO may delegate this responsibility to other appropriate staff within the Region/program.

**C.** The CTO is the FBMS ICT approver.

**(1)** To approve a request, he/she must ensure the Requiring Official has included appropriate Section 508 documents (i.e., GPAT, any 508 solicitation language, and acceptance criteria) in the purchase request.

**(2)** If an SOW is included in the procurement, the 508 solicitation language must be incorporated into the SOW.

**(3)** Using the buyaccessible.gov tool helps identify which standards apply to the product or service. For standard ICT products, buyaccessible.gov’s “quick links for standard deliverables” page will generate a GPAT and 508 solicitation language. The site’s wizard will generate an evaluation template.

## **COs and CONTRACTING STAFF**

### **5.8 What are the requirements OMB has placed on COs?**

**A.** In addition to the responsibilities we describe in Table 5-1, COs must ensure that every aspect of procurement, from developing a request for proposal to awarding the contract, takes into consideration accessibility standards and meets the requirements of both Section 508 and the FAR.

**B.** As the “last link in the FBMS custody chain,” COs and other Contracting staff are in the best position to review and ensure Section 508 requirements are addressed in the procurement. The CO must ensure that requirements, inspection and acceptance criteria, and evaluation factors are appropriately represented in the solicitation.

**C.** If Section 508 documents (i.e., GPAT and 508 solicitation language) are not included in the purchase request, the CO must notify the Requiring Official and suspend procurement activities until the Requiring Official gives him/her the missing documentation.

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D. The CO must also determine appropriate proposal evaluation factors and coordinate the proposal evaluation.

## **WHEN YOU CANNOT MEET THE STANDARDS**

### **5.9 What must Service employees do if a product or service they need does not meet the applicable Section 508 accessibility standards?**

A. If a product or service that you need does not meet Section 508 standards, you may still be able to procure it, but only after conducting market research, documenting that research, and receiving approval from the Department's Section 508 Coordinator. See 270 FW 4 for information about the process required to receive a "commercial non-availability" or any other type of exception.

B. If a product/service is available that only partially meets the Section 508 standards, do not claim a product/service is not available. In this situation, you must use the product/service that best meets the accessibility standards and your specified business needs.

C. If the purchase is entered into FBMS, all documentation (including the Department's approval of the exception) must be attached to the FBMS purchase request. If it is a credit card purchase, this documentation should be kept as a record of the purchase.

### **5.10 What if obtaining ICT that meets accessibility standards would be an undue burden to the Service?**

A. An undue burden is a significant difficulty or expense. If the situation meets the high threshold that has been set, a Requiring Official may obtain an exception to the accessibility standards from the Department's Section 508 Coordinator. See 270 FW 4 for more information about how to document and get approval for this exception.

B. When conformance to one or more requirements in the Section 508 accessibility standards imposes an undue burden, Regions/programs must provide individuals with disabilities access to and use of information and data by an alternative means that still meets the users' needs. Alternative means focus on providing the information and data in an accessible manner, as opposed to the accessibility of the product itself.

## **AFTER THE AWARD**

### **5.11 What has to happen after the Requiring Official receives a deliverable?**

A. The Requiring Official must inspect the deliverable before he/she accepts it to ensure it meets accessibility standards.

B. Buyaccessible.gov generates an evaluation template for unique purchases, but not for

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standard ICT products. For standard ICT products, the Requiring Official may test against the GPAT to evaluate the deliverable.

**5.12 What does the Requiring Official do with the evaluation template after testing the deliverable?** Each Region, program, and Requiring Official is responsible for the custody of the original inspection reports. Consult your Regional or Program Section 508 Coordinator to determine how they retain these reports, or you may follow your Region's or program's records schedule (see 283 FW 2 for the Service Disposition Schedule).

/sgd/ James W. Kurth  
ACTING DIRECTOR

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