Meeting of the Federal Exchange on Employment and Disability (FEED)

June 8, 2022
Agenda

Introduction (1:00-1:05 p.m.)
• Akinyemi Banjo, Policy Advisor, Employer and Workplace Policy, Office of Disability Employment Policy (ODEP), Department of Labor

Welcoming Remarks (1:05-1:10 p.m.)
• Anupa Iyer, Chief of Staff, ODEP, Department of Labor

Presentation: Understanding Section 508 Program Maturity Reporting Requirements (1:10-1:50 p.m.)
• Andrew Nielson, Director of the Government-wide IT Accessibility Program, Office of Government-wide Policy, General Services Administration (GSA)

Accessibility in Action: The Intelligence Community’s IT Accessibility Program Maturity Model (1:50-2:30 p.m.)
• Dr. Rosemary Speers, Chief Scientist for Avail Solutions LLC

Question and Answer Session (2:30-2:50 p.m.)

Closing Remarks (2:50-3:00 p.m.)
• Jennifer Croft, Diversity Program Manager, Office of Diversity, Equity, Inclusion and Accessibility, Office of Personnel Management (OPM)
Presenters

Andrew Nielson
Director of the Government-wide IT Accessibility Program, Office of Government-wide Policy
General Services Administration

Dr. Rosemary Speers
Office of the Director of National Intelligence (ODNI)
Semi-Annual OMB Section 508 Program Maturity Report
Accessibility Maturity Reporting Requirement

- The OMB Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act *(issued in 2013)* requires that Executive Branch agencies assess and self-report semi-annually on the maturity of their Section 508 Programs, including that:
  - The Federal CIO **Council Accessibility Community of Practice** (ACOP) develop standard template for reporting Section 508 conformance and program maturity
  - Agencies define plans to conduct baseline assessment
  - Agencies share progress using standard template
  - Agency reporting on Section 508 conformance and program maturity is conducted as part of OMB’s **Integrated Data Collection** program
The Five Section 508 Program Maturity Measures

- **Acquisition**: Measures the extent to which your organization reviews and validates that contract language in procurement documents (e.g., Statements of Work) addresses IT accessibility/Section 508 compliance.

- **Technology Lifecycle Activities**: Measures the extent to which your agency validates that Section 508 requirements are incorporated into technology lifecycle activities such as enterprise architecture, design, development, testing, deployment, and ongoing maintenance.

- **Testing and Validation**: Measures the extent to which your agency conducts testing and validation of Section 508 conformance claims.

- **Complaints Process**: Measures the extent to which your agency tracks and resolves incoming Section 508 complaints.

- **Training**: Measures the extent to which your agency trains stakeholders on roles and responsibilities related to Section 508 compliance.
The Four Maturity Level Definitions

The 5 program maturity measures are self-reported and are scored using the following four maturity levels:

- **Ad Hoc**: No formal policies, process or procedures defined
- **Planned**: Policies, processes and procedures defined and communicated
- **Resourced**: Resources committed and/or staff trained to implement policies, processes and procedures
- **Measured**: Validation is performed; results are measured and tracked
Intelligence Community Information Technology Accessibility Program Maturity Model

Dr. Rosemary Speers
Office of the Intelligence Community Chief Information Officer (IC CIO)
Diversity, Equity, Inclusion, and Accessibility (DEIA) Team
Overview of Presentation

1. IT Accessibility in the Intelligence Community
   • IC Elements
   • Unique considerations for the IC
   • IC IT Accessibility Community of Interest

2. IC IT Accessibility Program Maturity Model
   • Development of the model
   • Structure and use
   • Next steps
Intelligence Community

• The Director of National Intelligence (DNI) serves as the head of the IC

• The IC is a coalition of 18 agencies and organizations (IC Elements), including the Office of the DNI (ODNI)

From www.odni.gov
Considerations for IT Accessibility in the IC

• Mission requires both information sharing and safeguarding
• Accessibility tools and services must be cleared for use in IC spaces and on IC networks
• National Security Systems exception to requirements for Section 508
• IC reciprocity

• National Security Systems
  o Information technology...which involves intelligence activities, cryptologic activities related to national security, command and control of military forces,...weapons systems,...or systems critical to the direct fulfillment of military or intelligence missions

From www.section508.gov
The IC IT Accessibility COI was established in 2018, under the IC CIO Council, to propose strategic recommendations for improving IT accessibility.

The Chief for IT DEIA, who supports the IC CIO, leads the IT Accessibility COI.

Members of the COI include Section 508 program managers from IC Elements.
1. IT Accessibility in the Intelligence Community
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2. IC IT Accessibility Program Maturity Model
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Directives and Guidance for IT Accessibility

- Section 504 of the Rehabilitation Act includes modifications to the work environment that will enable an employee with a disability to perform essential job functions.
- Section 508 of the Rehabilitation Act, as amended, ensure individuals with disabilities have access to and full use of information and data.

**2015 - 2020**
- (U) IC Equal Employment Opportunity and Diversity Enterprise Strategy

**Nov 2017**
- (U) DoD Directive for Accessibility of Information Communication Technology (DODD 8000.1)

**Feb 2019**
- (U) IC Policy Guidance for Employment of Individuals with Disabilities (ICPG 110.1)

**June 2021**
- (U) EO 14035: DEIA in the Federal Workforce

**Nov 2021**
- (U) Government-Wide Strategic Plan to Advance DEIA in the Federal Workforce

AskEARN.org 14
Development of the Maturity Model

• The IC IT Accessibility COI reviewed and considered several maturity models, including:
  ▪ GSA maturity model
  ▪ Library of Congress maturity model
  ▪ LevelAccess model (from industry)

• The COI developed a hybrid model that more fully aligns with, and measures, IC-specific activities
Maturity Levels 1-5

- The IC IT Accessibility Program Maturity Model have five maturity levels:
The maturity levels are assessed across ten core dimensions:

1. Accessibility Program Office
2. Policies, Procedures, & Standards
3. Acquisition & Procurement
4. Technology Lifecycle Activities
5. Testing & Validation
6. Communications
7. Document Accessibility
8. Training
9. Culture & Leadership
10. IC Collaboration
The maturity model is detailed in a document that includes:

- Overview
- Descriptions of maturity levels and core dimensions
- Tables with checklists for the core dimensions
- List of acronyms and glossary with definitions of terms

<table>
<thead>
<tr>
<th>Training</th>
<th>Core Dimension #8</th>
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<tbody>
<tr>
<td><strong>Level 1 - Initial</strong></td>
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<tr>
<td>Training about IT accessibility is provided on a reactive, or ad hoc, basis</td>
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<td>Records for completion of IT accessibility training may be maintained by individuals but are not centrally stored or tracked</td>
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<td><strong>Level 2 – Emergent</strong></td>
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<td>Accessibility training plan and curriculum are defined for employees/stakeholders</td>
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<td>Accessibility training is readily available for specific requests or job categories</td>
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<td>Resources are available to procure, develop, and implement accessibility training</td>
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<td>Disability/accessibility awareness training is being developed for all employees</td>
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<td><strong>Level 3 – Structured</strong></td>
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<td>Trained and resourced staff are in place to implement training about accessibility</td>
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<td>Increased levels of technical complexity in training are provided based on needs</td>
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<td>Competency framework is established, in conjunction with Human Resources, to include accessibility standards as part of professional development skills goals</td>
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<td>Disability/accessibility training is mandatory for all employees</td>
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<td><strong>Level 4 – Integrated and Sustainable</strong></td>
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<td>Training quality is assessed and content is updated on a regular basis</td>
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<td>New areas for training are identified based on program metrics and trends</td>
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<td>Training metrics are reported and recorded</td>
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<td><strong>Level 5 – Optimized</strong></td>
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<td>Training is actively pushed to projects/individuals when warranted by metrics</td>
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<td>Training updates include modifications based on survey feedback</td>
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<td>Training is offered to other IC elements/agencies</td>
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Conducting a Maturity Assessment

• Initially, the COI members conducted a pilot test, to help refine the maturity model.
• After changes were made to the model, each IC Element had a couple months to complete a maturity assessment and provide results to the Chief for IT DEIA.

• Each IC Element reported ten ratings, one for each dimension, rather than a single summary score or roll-up rating.
• Several IC Elements also documented their accomplishments and objectives for improvement, to help with their future maturity assessments.
Scoring the Maturity Assessments

• The COI decided that, in order to achieve a specific level of maturity, all of the items for that level must be completed
  ▪ Later, the group used half-scores for levels that were partially completed

• Notional scoring for an IC Element:
Next Steps

• Encourage IT accessibility best practices in documents, deliverables, and IT program reviews

• Prioritize accessibility in procurement, development, and design, with the user experience at the forefront, to enable agencies to build accessible, innovative, and empowering solutions for the IC

• Share the maturity model with Federal partners and other IC Elements, helping them integrate the model into their assessments

• Share current best practices and do in common what we can, to accelerate integration and adoption of Section 508 standards across the Intelligence Community
Questions?
The Employer Assistance and Resource Network on Disability Inclusion (EARN) is a resource for employers seeking to recruit, hire, retain and advance qualified employees with disabilities. This publication is fully funded by the U.S. Department of Labor’s Office of Disability Employment Policy (ODEP) under cooperative agreement No. OD-33975-19-75-4-36 with Cornell University. The total four-year cost of this agreement amounts to $10,000,000. This document does not necessarily reflect the views or policies of the U.S. Department of Labor, nor does mention of trade names, commercial products or organizations imply endorsement by the U.S. Government.