

Framing Companies into Accessible Operations: Policy Driven Adoption for Accessibility (PDAA)

[Sarah Bourne](#)

Director of IT Accessibility, Massachusetts Office of Information Technology

[Jeff Kline](#)

Statewide IT Accessibility Coordinator, Texas Department of Information Resources

[Jay Wyant](#)

Chief Information Accessibility Officer, Minnesota IT Central

March, 2015

Regards from Massachusetts!



The Procurement Dependency



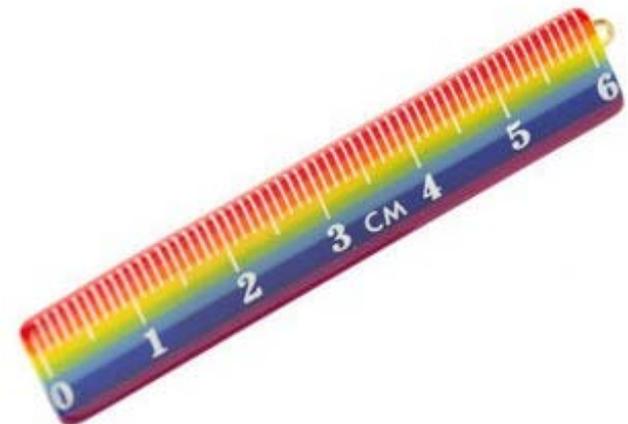
Vendor sourced IT products and services make up the majority of government IT

- Most products and services do not meet accessibility technical standards (US 508, WCAG 2.0 AA)
- There will be continued high dependency on procured IT for the foreseeable future

The Accountability Issue

How do we measure accessibility?

- VPATS only apply to goods and customized products
 - Accuracy depends on vendors' expertise
- Does not cover professional/technical services and related deliverables
- How to choose between competing products with low accessibility?
- How to measure vendor commitment to future improvements?



Current IT Accessibility Models Not Working Well

Recent US government reports...

Source	Results
National Disability Policy Progress Report - 2012	<ul style="list-style-type: none"> • Rarely mentions ICT accessibility
Section 508 Report to the President and Congress: Accessibility of Federal Electronic and Information Technology - 2012	<ul style="list-style-type: none"> • Finds that less than 50% of agency components incorporated specific applicable Section 508 Accessibility Standards as requirements in each procurement solicitation... • Little to no validation against Section 508 criteria performed on procured products
US E-Government Website Quality Report - 2012	<ul style="list-style-type: none"> • The accessibility benchmark shows that two-thirds of federal sites achieved a moderate level of compliance federal sites • 28% of sites in the study achieved the lowest compliance band. • Automated testing only; tool(s) not defined

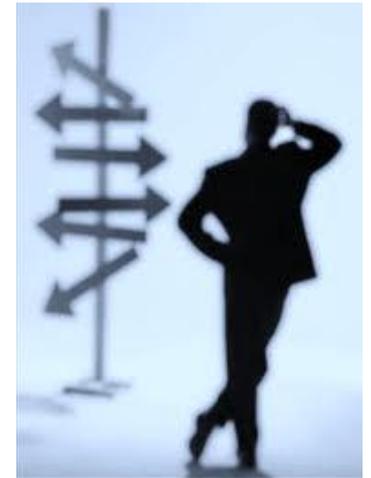
The situation in Europe and the rest of the world isn't any better...

Source	Results
European Commission research behind Proposed Directive on Accessibility of Public Sector websites (Dec 2012)	<ul style="list-style-type: none"> • Only one-third of Europe's 761,000 public-sector and government websites are accessible
G3ict: CRPD 2012 ICT Accessibility Progress Report	<ul style="list-style-type: none"> • Indicates significant deficits to set in place a foundation to promote ICT accessibility

IT accessibility today is a governance problem

Pushing technical specifications/standards has not been an adequate adoption driver

- Technical standards are execution criteria not governance criteria
- Nothing in today's technical standards address governance
- No silver bullet technology solutions on the horizon



Challenge

- What can help ICT vendors better meet technical standards and government regulations for ICT accessibility?

Public sector governance model trends

President's Office of Management and Budget (OMB)

- **“Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act” – Jan. 2013**
 - Federal agencies must have accessibility statement (policy) on internet / intranet websites
 - Template for reporting baseline compliance by agencies to OMB / others
 - Naming of a 508 coordinator for each agency
 - Delivery of learning modules by the GSA



Ontario: Accessibility for Ontarians with Disabilities Act (AODA)

- **Requires: Public and private entities with over 20 employees operating in Ontario to**
 - Establish accessibility policies
 - Establish, implement, maintain and document accessibility plans
 - File Accessibility Compliance Reports online
 - Incorporate accessibility criteria and features into procurement
 - Timetables for required compliance
 - Fine schedules





Governance included in settlements

HR Block & PeaPod

- Appoint a skilled web accessibility coordinator who will report directly to an executive
- Adopt a web accessibility policy
- Mandatory accessibility training for web content personnel

Youngstown State University & University of Montana

- Develop web accessibility policy and an implementation and remediation plan
- Mandatory accessibility training for web content personnel
- Put in place mechanisms to ensure that the sites continue to be accessible.

Time for: Policy Driven Adoption for Accessibility (PDAA)

The integration of IT accessibility governance into organization policies in a way that enables them to drive themselves to improve accessibility adoption.

- Makes IT accessibility difficult to ignore
- Not prescriptive, tells what, not how
- Governed through non-technical methods
- Accelerates marketplace innovations

How does PDAA implementation help vendors?

Organizations with fully implemented PDAA can have:

- Competitive advantage in public sector solicitations
- Improved Search Engine Optimization (SEO)
- Increased market share through expansion of customer base
- Increased brand equity through social responsibility
- Improved ability to hire and retain people with disabilities
- Risk mitigation if ADA complaints / litigation arises
 - In ICT accessibility, E for Effort counts!

NASCIO PDAA Workgroup: 2013 - Present



Goal: Create working procurement model

- Representation from 10 states and 1 federal government agency
- Championed by Texas State CIO
- Objectives
 - Develop a common set of PDAA criteria
 - Include supporting deliverables for vendor self guidance and progress measurement
- Package as model for adoption by states

PDAA Participants

State	Title
Arkansas	Chief Technology Officer / Director of Arkansas Department of Information Systems
Arkansas	Chief Enterprise Architect / Arkansas Department of Information Systems
California	Deputy Director, Statewide Technology Procurement / California Department of Technology
California	Chief Purchasing Manager, Statewide Technology Procurement / California Department of Technology
Federal	US Consumer Financial Protection Bureau / Senior Procurement Executive
Federal	Outreach Specialist / US Consumer Financial Protection Bureau
Kansas	Chief Information Security Officer / Office of Information Technology Services
Maine	Associate Chief Information Officer / Office of Information Technology
Massachusetts	Director of Assistive Technology / Mass. Information Technology Division
Minnesota	Chief Information Accessibility Officer / Minnesota IT Services
Puerto Rico	Vice President & Chief Information Officer / Information Systems Government Development Bank for Puerto Rico
Texas	Director, Technology Sourcing Office / Texas Department of Information Resources
Texas	Director, Technology Planning, Policy & Governance / Texas Department of Information Resources
Texas	Statewide EIR Accessibility Coordinator / Texas Department of Information Resources
Texas	Sr. Project Manager / Texas Department of Information Resources
Texas	Director, Texas Procurement and Support Services (TPASS) / Texas Comptroller of Public Accounts
Utah	Chief Technology Officer / Department of Technology Services
Utah	Executive Director and Chief Information Officer / Department of Technology Services
Virginia	Strategic Sourcing Manager / Virginia Information Technologies Agency (VITA)
Virginia	Web Development and Production Support Manager / Virginia Information Technologies Agency
Virginia	Enterprise Architect & Agency Records Officer / Policy, Practice & Architecture / Virginia Information Technologies Agency
Virginia	Disability Agencies Web Lead / Department of Rehabilitative Services
Virginia	Manager, IT Investment Management Office / Virginia Information Technologies Agency
Virginia	Chief Operations Officer / Virginia Department for Aging and Rehabilitative Services
Virginia	Application Services Manager/ Enterprise Solutions and Governance / Virginia Information Technologies Agency

PDAA Deliverables

Deliverables completed and reviewed by workgroup members:

- PDAA Core Criteria
- PDAA Maturity Model
- Self-assessment form/questionnaire for vendors
- PDAA FAQs
- Generic vendor implementation timeline
- List of resources

PDAA Core Criteria for Vendors

- 1. Develop, implement, and maintain an ICT accessibility policy.**
- 2. Establish and maintain an organizational structure that enables and facilitates progress in ICT accessibility.**
- 3. Integrate ICT accessibility criteria into key phases of development, procurement, acquisitions, and other relevant business processes.**
- 4. Provide a process for addressing inaccessible ICT.**
- 5. Ensure the availability of relevant ICT accessibility skills and other resources within (or to) the organization.**
- 6. Make information regarding ICT accessibility policy, plans, and progress available to customers.**

PDAA Core Criteria #1

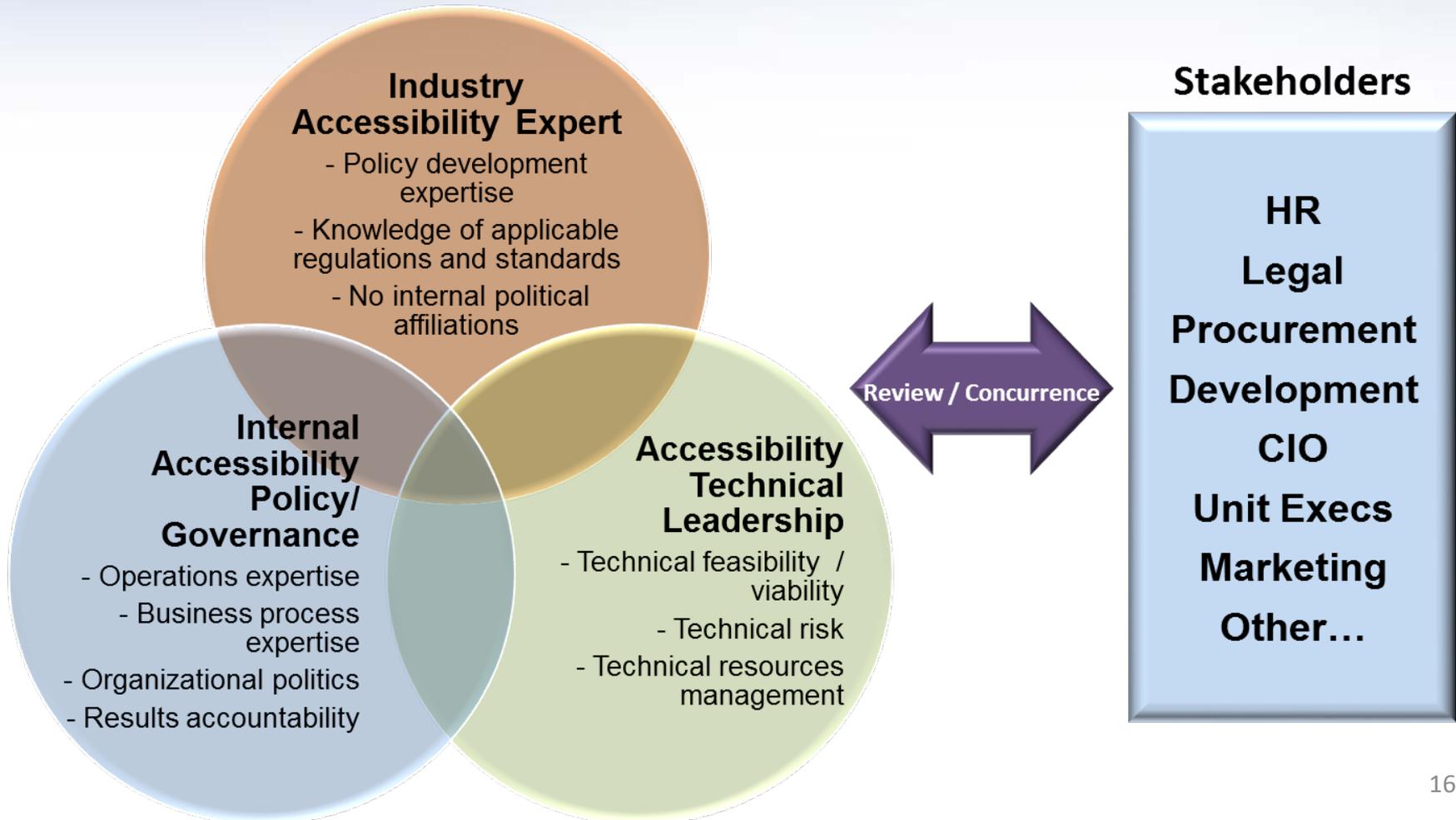
Develop, implement, and maintain an ICT accessibility policy.

- Creates a foundation on which accessibility programs and initiatives can be built.
- Ensures continuity of accessibility efforts by supporting strategic rather than tactical efforts.
- Allows people in different roles across the organization to understand their responsibilities.

	Core Criteria	Launch	Integrate	Optimize
1.	Develop, implement, and maintain an ICT accessibility policy.	Have an ICT accessibility policy.	Have appropriate plans in place to implement and maintain the policy.	Establish metrics and track progress towards achieving compliance to the policy.

Developing an organization-wide IT accessibility policy

Core Team for Accessibility Policy Development



PDAA Core Criteria #2

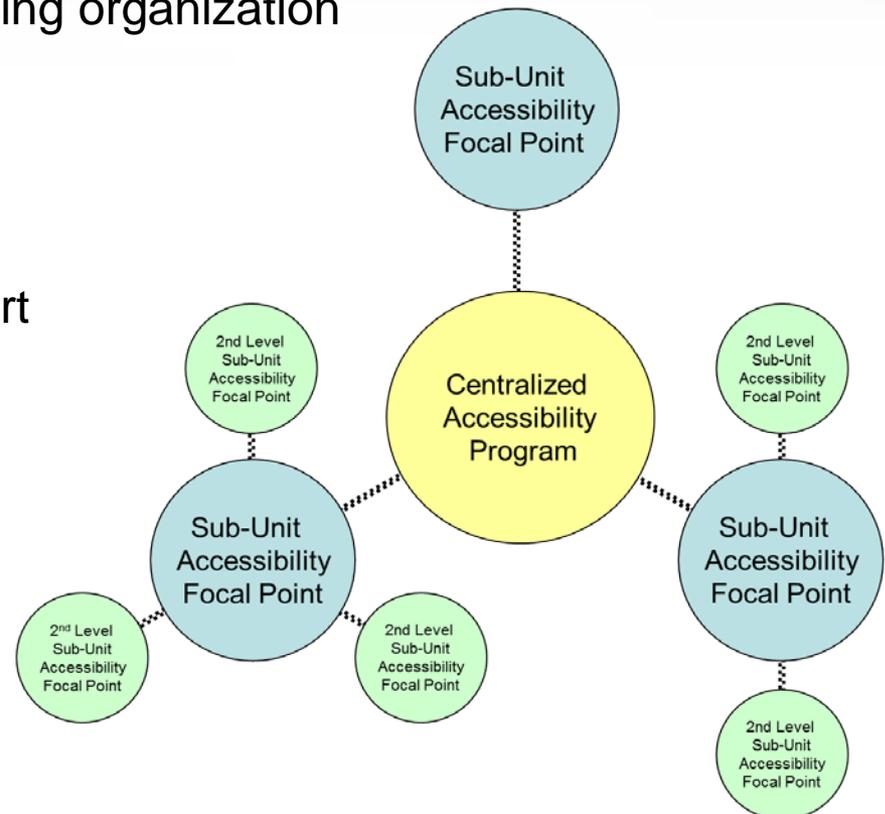
Establish and maintain an organizational structure that enables and facilitates progress in ICT accessibility.

- Ensures that ICT accessibility roles are identified and positioned within the organization for greatest impact
- Defines responsibilities across the organization, including the designation of an executive sponsor.

	Core Criteria	Launch	Integrate	Optimize
2.	Establish and maintain an organizational structure that enables and facilitates progress in ICT accessibility.	Develop an organization wide governance system.	Designate of one or more individuals responsible for implementation.	Implement reporting/decision mechanism and maintain records.

Organizing accessibility

- Senior manager “executive sponsor”
- “Neutral” organizational placement
 - Analysis of implications based reporting organization
- Centralized accessibility function
 - Policy and governance
 - Technical consulting
 - Business development / sales support
 - Project office
 - Other?
- Sub-Unit focal points / coordinators



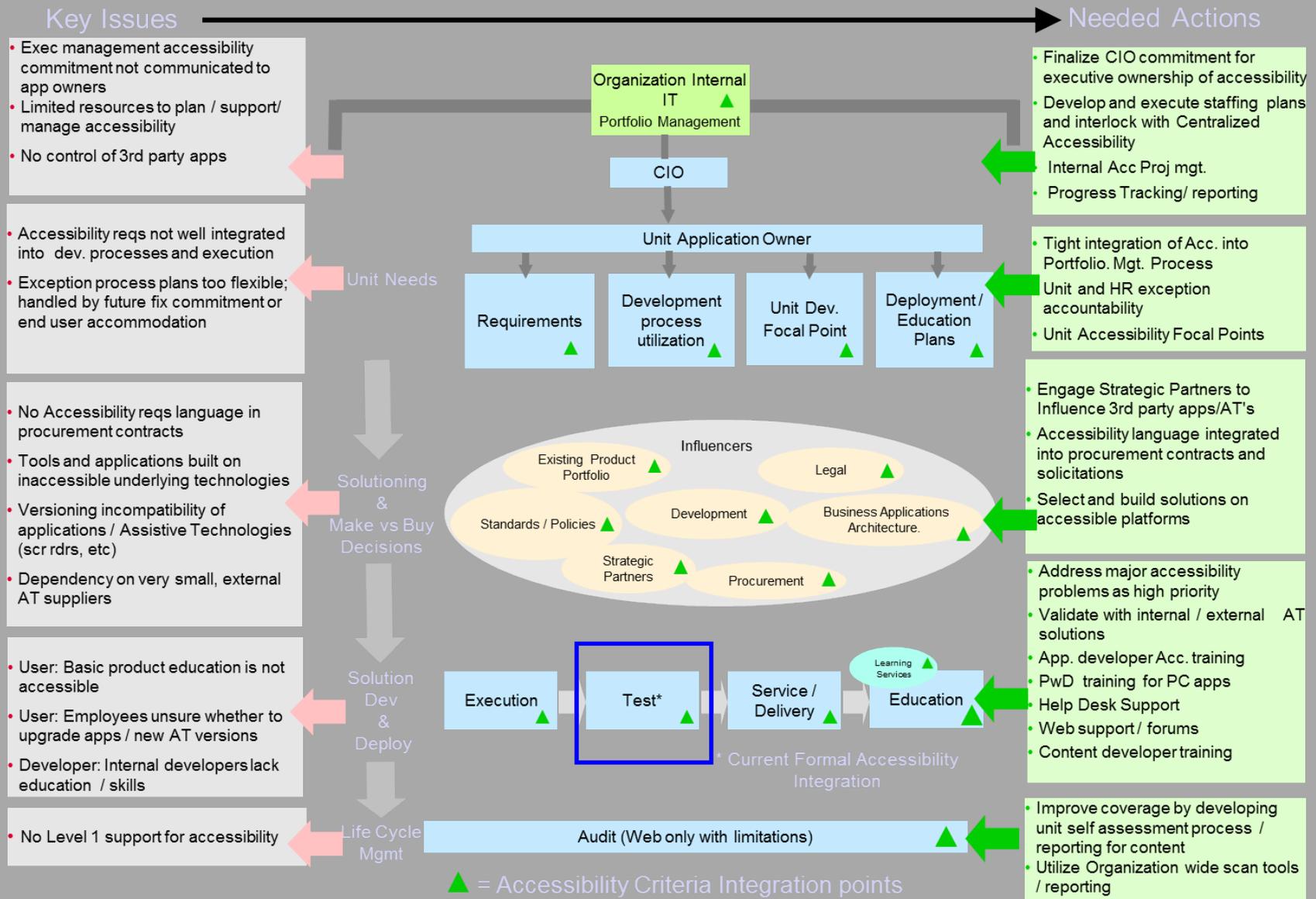
PDAA Core Criteria #3

Integrate ICT accessibility criteria into key phases of development, procurement, acquisitions, and other relevant business processes.

- Ensures that ICT accessibility is implemented in a consistent, repeatable fashion
- Removes dependency on specific individuals who “carry the torch” for specific events or projects where ICT accessibility is required.

Core Criteria	Launch	Integrate	Optimize	
3.	Integrate ICT accessibility criteria into key phases of development, procurement, acquisitions, and other relevant business processes.	Identify candidate processes for criteria integration.	Implement process changes.	Integrate fully into all key processes.

Integrate Accessibility into Key Business Processes: Analysis Example



PDAA Core Criteria #4

Provide a process for addressing inaccessible ICT.

- Ensures that plans are developed to address ICT accessibility issues once identified.
- Provides a mechanism to implement accommodations until the ICT is accessible

	Core Criteria	Launch	Integrate	Optimize
4.	Provide processes for addressing inaccessible ICT.	Create plans that include dates for compliance of inaccessible ICT.	Provide alternate means of access until the ICT is accessible; implement corrective actions process for handling accessibility technical issues and defects	Maintain records of identified inaccessible ICT, corrective action, and tracking.

PDAA Core Criteria #4: Examples

Examples of addressing inaccessible ICT

- Corrective actions identification and tracking in product development life cycle
- Procurement of future, more accessible ICT
- Mechanism for providing alternate means of access until the ICT is made accessible or replaced
 - 1-800 numbers, etc.

PDAA Core Criteria #5

Ensure the availability of relevant ICT accessibility skills and other resources within (or to) the organization.

- Identify necessary knowledge/skills and existing gaps
- Provide training opportunities
- Include accessibility skills in hiring criteria
- Track and manage gaps

	Core Criteria	Launch	Integrate	Optimize
5.	Ensure the availability of relevant ICT accessibility skills within (or to) the organization.	Define skills/job descriptions.	Identify existing resources that match up and address gaps.	Manage progress in acquiring skills and allocating qualified resources.

Identify Skill Gaps and Build “Role Based” Accessibility Training Plans

Course Level	Course Title	All Staff	Web Content Producers	Web & Application Testers	Web Application Developers	Procurement Staff	Contract Writers	Contract Compliance	Project Managers
Fundamentals	Introduction to Accessibility (Self)	Required	Required	Required	Required	Required	Required	Required	Required
Fundamentals	Office Documents (Internal)	Optional	Required	Optional	Optional	Required	Required	Optional	Required
Fundamentals	PDF (Internal)	Required / Optional*	Required	Optional	Optional	Required / Optional*	Required / Optional*	Required / Optional*	Required / Optional*
Fundamentals	HTML (Internal or External)		Required	Required	Required				
Fundamentals	HTML Forms (Internal or External)		Required	Optional	Required				
Fundamentals	Testing & Tools (Internal or External)		Required	Required	Required				
Fundamentals	CSS (Internal or External)		Optional	Optional	Required				
Fundamentals	Javascript (Internal or External)		Optional	Optional	Required				
Advanced	Sharepoint / Dreamweaver (Internal or External)				Required / Optional*				
Advanced	ASP / ASP.Net (Internal or External)				Required / Optional*				
Advanced	Java / JSP (Internal or External)				Required / Optional*				
Advanced	Web 2.0 Technologies (Internal or External)				Required / Optional*				
Specialized	Accessibility Law, and its Impacts					Required	Required	Required	Required
Specialized	Accessibility in Contract Solicitations					Required	Required	Required	Required
Specialized	Understanding/validating Vendor IT accessibility					Required	Required	Required	Required

* As needed based on assignment.

PDAA Core Criteria #6

Make information regarding ICT accessibility policy, plans, and progress available to customers.

- Encourages formalized tracking and management of PDAA initiatives
- Provides customers with information for gauging organizational abilities and progress

	Core Criteria	Launch	Integrate	Optimize
6.	Make information regarding ICT accessibility policy, plans, and progress available to customers.	Make Launch level information available.	Make Integrate level information available.	Make Optimize level information available.

PDAA Maturity Model

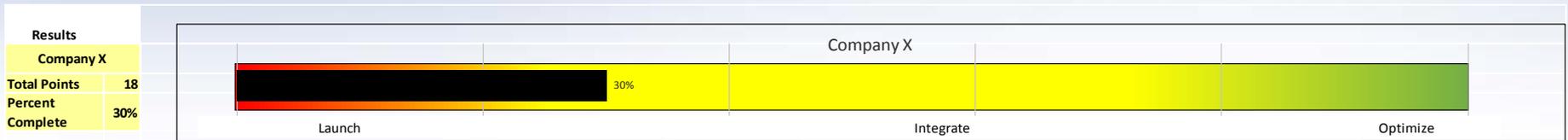
	Core Criteria	Launch	Integrate	Optimize
1.	Develop, implement, and maintain an ICT accessibility policy.	Have an ICT accessibility policy.	Have appropriate plans in place to implement and maintain the policy.	Establish metrics and track progress towards achieving compliance to the policy.
2.	Establish and maintain an organizational structure that enables and facilitates progress in ICT accessibility.	Develop an organization wide governance system.	Designate of one or more individuals responsible for implementation.	Implement reporting/decision mechanism and maintain records.
3.	Integrate ICT accessibility criteria into key phases of development, procurement, acquisitions, and other relevant business processes.	Identify candidate processes for criteria integration.	Implement process changes.	Integrate fully into all key processes.
4.	Provide processes for addressing inaccessible ICT.	Create plans that include dates for compliance of inaccessible ICT.	Provide alternate means of access until the ICT is accessible; implement corrective actions process for handling accessibility technical issues and defects	Maintain records of identified inaccessible ICT, corrective action, and tracking.
5.	Ensure the availability of relevant ICT accessibility skills within (or to) the organization.	Define skills/job descriptions.	Identify existing resources that match up and address gaps.	Manage progress in acquiring skills and allocating qualified resources.
6.	Make information regarding ICT accessibility policy, plans, and progress available to customers.	Make Launch level information available.	Make Integrate level information available.	Make Optimize level information available.

Generic Vendor Implementation Timeline

Criteria (begins when vendor is informed of PDAA)	6mo	12mo	18mo	24mo
1. Develop, implement, and maintain an ICT accessibility policy.				
a. Have an ICT accessibility policy.				
b. Have appropriate plans in place to implement and maintain the policy.				
c. Establish metrics and track progress towards achieving compliance to the policy				
2. Establish and maintain an organizational structure that enables and facilitates progress in ICT accessibility.				
a. Develop an organization wide governance system.				
b. Designate of one or more individuals responsible for implementation				
c. Implement reporting/decision mechanism and maintain records.				
3. Integrate ICT accessibility criteria into key phases of development, procurement, acquisitions, and other relevant business processes.				
a. Identify candidate processes for criteria integration.				
b. Implement process changes.				
c. Integrate fully into all key processes.				
4. Provide a process for addressing inaccessible ICT including:				
a. a plan / date for compliance of an inaccessible ICT.				
b. an alternate means of access until the ICT is accessible.				
c. a corrective actions process for handling accessibility technical issues and defects.				
5. Ensure the availability of relevant ICT accessibility skills within (or to) the organization.				
a. Define skills/job descriptions.				
b. Identify existing resources that match up and address gaps.				
c. Manage progress in acquiring skills and allocating qualified resources.				
6. Make information regarding ICT accessibility policy, plans, and progress available to customers.				
a. Make Launch level information available.				
b. Make Integrate level information available.				
c. Make Optimize level information available.				

PDAA Vendor Self Assessment Tool and FAQs

The PDAA Vendor Self-Assessment Tool ([Open tool](#))



- FAQs for vendors and procurement organizations.
- Questionnaire for vendors regarding the vendor's ICT accessibility policy and progress against the PDAA Core Criteria.
- Results can be used by both:
 - Procurement organizations
 1. Help assess a vendor's ability to produce accessible offerings
 2. Gauge confidence in vendor's VPAT or other accessibility documentation
 3. Track vendor progress and improvement in ICT accessibility initiatives
 4. Use as part of vendor selection decisions
 - Vendors
 1. Guide the implementation of organization wide accessibility programs / initiatives
 2. Help achieve more accessible offerings over the long term

PDAA Vendor Self Assessment Tool

Applicability

Assessment addresses different vendor types

- **Manufacturer**
 - Develops and sells its own ICT products / services
 - Must also provide VPATs where appropriate
- **Service Provider**
 - Sells IT development services
- **Integrator**
 - Develops customer solutions using a combination of 3rd party and in-house products and services
 - Must also provide VPATs where appropriate
- **Distributor or Reseller**
 - Does not develop or have its own products, but offers COTS 3rd party products
 - Must also require and provide access to VPATs where appropriate

PDAA Reference Information

For both procurement organizations and vendors

- [Techcheck](#) – On Line Assessment Tool developed by the [Partnership on Employment and Accessible Technology \(PEAT\)](#) and sponsored by the [Office of Disability Employment Policy \(ODEP\)](#), U.S. Department of Labor
- [W3C – Web Accessibility Initiative - Planning and Implementing Web Accessibility](#)
- [British standard BS-8878 Web Accessibility Code of Practice](#) - Accessibility business process integration
- [Strategic IT Accessibility: Enabling the Organization](#) – Reference book on organizational accessibility enablement, strategy, and implementation
- [Digital Accessibility Maturity Model \(DAMM\)](#) from SSB Bart Group - A Capability Maturity Model based framework to help digital accessibility programs measure their development against an objective yardstick
- [Accessibility Implementation Framework](#), Texas Department of Information Resources - A comprehensive framework and project plan to guide an organization's IT accessibility program and initiatives

PDAA in Practice - Texas

Texas DIR initiated use of PDAA in August 2014

- “Education IT Products and Services” request for offerings (RFO)
 - Vendors required to complete assessment
 - Results not scored as part of contract award criteria
 - Responses recorded and compared to later responses in:
 - Subsequent solicitations
 - Contract renewals
- Results planned to be available at customer requests
- New RFOs using the PDAA tool

[Link to DIR PDAA site](#)



PDAA in Practice – Minnesota

PDAA pilot for feedback

- PDAA materials posted on public website
- Five vendors with current long-term contracts asked to complete self-evaluation and submit results
- Use feedback from both administrative and vendor side to analyze model, determine next steps

Link to [MN PDAA site](#)

Next Steps

- Increase adoption by member workgroup organizations and by state governments, federal agencies, and private sector organizations
- Continue to socialize PDAA and obtain input from public and private sector accessibility communities
 - NASCIO “Issue Brief” paper in process
- Explore universal locations (website) for PDAA information repository hosting

Questions?

Thank you!

Sarah Bourne, State of Massachusetts

Jeff Kline, State of Texas

Jay Wyant, State of Minnesota