

**NCA ACCESSIBLE INFORMATION AND COMMUNICATIONS TECHNOLOGY  
(SECTION 508 COMPLIANCE)**

**1. REASON FOR ISSUE.** This issuance establishes policy and assigns responsibilities to ensure National Cemetery Administration (NCA) compliance with Federal and Department level requirements associated with accessible information and communications technology (ICT).

**2. SUMMARY OF CONTENTS.** This is a new issuance and includes the standard elements for NCA directives:

a. Statement of purpose, authorities and scope of this directive.

b. NCA-specific policies implementing higher level guidance to ensure proficient implementation of Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d), as amended by the Workforce Investment Act of 1998 (Public Law 105-220).

c. Roles and responsibilities for managing and implementing NCA's Section 508 program, and training requirements for all NCA personnel based on roles and engagement in production of ICT.

d. Definitions and references related to accessible ICT, and a summary of related authorities (see Appendix A).

e. Guidance for how to get assistance with Section 508 requests (see Appendix B).

**3. RESPONSIBLE OFFICE:** National Cemetery Administration, Office of Engagement and Memorial Innovation, Digital Services (44B), 810 Vermont Avenue, NW, Washington, DC 20420, is responsible for the contents of this directive. Questions may be referred to the Director of Communications.

**4. RELATED PUBLICATIONS:**

a. VA Directive 6221, Accessible Information and Communications Technology (ICT) (October 16, 2017).

b. VA Handbook 6221, Accessible Information and Communications Technology (ICT) (February 13, 2019).

**5. RESCISSIONS:** None.

**6. RECERTIFICATION:** This document is scheduled for recertification within five (5) years of date of issuance.

/s/  
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Acting Under Secretary for Memorial Affairs

Distribution: Electronic Only

## **NCA ACCESSIBLE INFORMATION AND COMMUNICATIONS TECHNOLOGY (SECTION 508 COMPLIANCE)**

### **1. PURPOSE, AUTHORITY AND SCOPE**

a. This directive supplements policy and guidance provided in Department of Veterans Affairs (VA) Directive 6221, Accessible Information and Communications Technology (ICT), assigns responsibilities for proper management of this program within the National Cemetery Administration (NCA), and establishes training requirements for personnel engaged in the production of ICT on behalf of NCA.

b. The primary authorities include Section 508 of the Rehabilitation Act of 1973, as amended, hereafter referred to as Section 508 (29 U.S.C. 794d), and ICT accessibility standards developed by the Architectural and Transportation Barriers Compliance Board (Access Board), as set forth at 36 C.F.R. Part 1194. Related authorities are outlined with a brief description in Appendix A.

c. This directive fulfills the VA Office of Inspector General's (OIG) recommendation by establishing a framework for staff training, enforcing compliance, and ensuring non-discriminatory access ICT for individuals with disabilities. (See "References" paragraph 7.e.)

### **2. BACKGROUND**

a. Section 508 of the Rehabilitation Act of 1973, as amended, requires that all ICT developed, procured, maintained, or used by Federal agencies on or after June 21, 2001, must meet ICT accessibility standards developed by the Access Board, as set forth at 36 C.F.R. Part 1194. In January 2017, the Access Board revised and updated the standards, with a required compliance date of January 18, 2018. This means any ICT developed, procured, funded, maintained or used on or after January 18, 2018, must adhere to the revised standards, which are published under 38 C.F.R. Part 1194, Appendix A, and can also be found on the Access Board website: Revised 508 Standards and 255 Guidelines ([access-board.gov](http://access-board.gov)). These standards apply to a wide range of technologies, including websites, software applications, hardware, multimedia, and electronic documents, among others.

b. The law also requires Federal agencies to ensure that individuals with disabilities who are Federal employees or members of the public seeking information or services from a Federal agency, have access to and use of information and data comparable to that provided to Federal employees or members of the public who are not individuals with disabilities, unless an undue burden would be imposed on the agency.

c. In January 2024, VA's Office of Inspector General (OIG) found that VA's efforts to comply with Section 508 of the Rehabilitation Act of 1973 could be improved. Specifically, the report indicated VA needs to enhance its web registry of websites, scan websites for compliance, and keep staff informed of accessibility requirements. One of the six recommendations is "educating staff on their obligations."

### 3. POLICY

a. NCA personnel with disabilities must have the same (or comparable) access to and use of information and data as NCA personnel who do not have disabilities.

b. Members of the public with disabilities seeking information or services from NCA must have the same (or comparable) access to, and use of, that information and services as members of the public who do not have disabilities.

c. NCA shall adhere to federal regulations and Department-level policies, to ensure all ICT developed, procured, funded, maintained, and used by NCA meets accessibility requirements. While the Department acknowledges the existence of lawful allowances for undue burden under 36 CFR Part 1194, Appendix A, NCA prioritizes accessibility and minimizing any potential impact on individuals with disabilities.

d. Accountability and responsibility for ensuring the accessibility of systems, products, and services to NCA personnel and the public lie with content owners. Digital content, including documents, images, videos, digital posters and flyers, are recommended to be created with accessibility in mind to minimize the time and resources required for remediation and ensure compliance with Section 508. To achieve this, owners and authors are recommended to undergo Section 508 accessibility training available in VA's Training Management System (TMS), equipping them with the requisite knowledge to produce ICT that aligns with Section 508 compliance standards. In the process, they are encouraged to seek guidance from the NCA Section 508 Coordinator to ascertain and confirm compliance adherence (see related guidance in Appendix B).

e. NCA employees involved in creating, editing, and/or designing digital content must ensure it complies with Section 508 accessibility standards before release or consult with NCA's Section 508 Coordinator before distributing or publishing. Consultation with NCA's Section 508 Coordinator will determine if the digital content requires accessibility audit, remediation or additional training may be recommended for the content owner if necessary (see related guidance in Appendix B).

### 4. RESPONSIBILITIES

a. **NCA Chief of Staff and Deputy Under Secretaries** are responsible for overall leadership of NCA's ICT activities and ensuring their respective subordinate staff's adherence to Section 508 policies and procedures.

b. **NCA Deputy Under Secretary for Management** is responsible for:

(1) Working with the VA Office of Information and Technology (OIT) to ensure all NCA managed systems and applications are compliant with Section 508 accessibility standards; and

(2) Ensuring that Section 508 requirements are incorporated into NCA acquisition packages, as appropriate

c. **Executive Director, Office of Engagement and Memorial Innovations (OEMI)** is responsible for overseeing the implementation of NCA's Section 508 requirements for NCA's intranet and internet domains, and education and awareness of ICT initiatives throughout NCA.

d. **Director of Communications, OEMI or designee(s)** is responsible for:

(1) Requesting funding and resources for NCA's comprehensive Section 508 program for NCA's intranet and internet domains, and education and awareness of ICT initiatives throughout NCA. Program activities include, but are not limited to, the management, implementation, and governance infrastructure;

(2) Designating an NCA Section 508 program coordinator; and

(3) Advocating for resources to ensure adequate access to remediation software, tools and capabilities necessary to support 508 compliance activities.

e. **NCA Section 508 Program Coordinator, OEMI or designee(s)** is responsible for:

(1) Serving as NCA's Section 508 Official.

(2) Facilitating Section 508 issues or concerns to appropriate NCA leadership and office.

(3) Ensuring Section 508 is incorporated into NCA acquisition processes, in accordance with public law.

(4) Leading NCA-level Section 508 related activities, including but not limited to training, acquisition, evaluation, compliance consultation, and development of more detailed procedural guidance as needed.

(5) Consolidating NCA Section 508 reporting metrics, as needed.

(6) Coordinating communication between the Department of Veterans Affairs (VA) Section 508 Office and NCA-level stakeholders to ensure transparency and efficient resolution of Section 508 concerns.

(7) Facilitating the review, update, and maintenance of NCA policies involving Section 508 compliance.

(8) Escalating NCA-level Section 508 concerns and issues to VA Section 508 Office.

(9) Representing NCA in all federal and interagency activities related to Section 508.

(10) Routinely monitoring the Section 508 websites of VA's Section 508 Office, the U.S. Access Board, and the General Services Administration (GSA) for updated guidance, training opportunities, and best practices.

(11) Establishing the Section 508 management, implementation, and governance plans that are at a minimum in compliance with NCA-level Section 508 policies, procedures, and performance measures.

(12) Authorizing, rejecting or determining guidelines for ICT which NCA procures, develops, maintains, or uses to be deployed or published on the merits of Section 508 conformance.

(13) Coordinating with NCA training office to identify Section 508 training courses, within TMS and elsewhere, ensuring their assignment to the appropriate staff based on their functional areas and need, and reporting on status, as necessary.

(14) Assisting NCA employees who need document remediation tools with requesting software services from VA OIT and provide support for training and use of remediation software tools.

(15) Collaborating with NCA's Web Content Management team and document owners to remediate ICT on NCA's public-facing website and intranet as needed. This includes identifying and addressing accessibility issues within documents linked from these sites.

**f. Senior Executives, District Executive Directors, Cemetery Directors, Central Office Service Directors, and Equivalent Level Managers and Supervisors** are responsible for recommending employees involved in developing digital content for NCA websites to undergo mandatory training on creating accessible PDFs, Word documents, PowerPoints, Excel spreadsheets, videos, and other digital materials.

**g. Human Capital Management Training Office** is responsible for assigning Section 508 training in TMS on request from the NCA Section 508 Program Coordinator.

**h. Video and Social Media Content Creators (Employees and Contractors)** are responsible for completing Section 508 awareness training, which may cover both general awareness and creating accessible videos.

**i. Graphic Designers (Employees and Contractors)** are responsible for completing Section 508 training, which may include general awareness and creating accessible PDFs.

**j. Contracting Officers (CO) and Contracting Officers Representatives (CORs)** are responsible for:

(1) Including accessibility requirements as appropriate within acquisition documents and requirements.

(2) When appropriate including evaluation criteria concerning Sections 508 accessibility standards in assessing vendors proposals.

(3) Completing Section 508 training on TMS based on the employee's primary functions, which may include subjects related to general awareness, remediation, creation or purchasing Section 508 ICT.

k. **Employees and Contractors involved in Creating Documents, Forms, and Presentations** are responsible for completing Section 508 training (within TMS or otherwise) tailored to their specific job roles, as needed. (Training may encompass both web-based modules and live instruction. The curriculum will equip employees with the knowledge and skills necessary to create accessible documents in widely used formats, such as Microsoft Word, Excel, PowerPoint, and PDF. Additionally, the training may include instruction on utilizing VA-approved tools for remediating existing documents and verifying their adherence to Section 508 accessibility standards).

## 5. DEFINITIONS:

a. **Digital content:** Any information created and distributed electronically, including documents, presentations, images, audio files, videos, and software applications.

b. **Content owner:** In the context of Government digital content, this refers to the person or entity responsible for creating, managing, editing and maintaining the content. Since Government works are typically public domain, the focus here on authorship and management, not copyright ownership. The team who created, designed, and edited the digital content are the content owners.

c. **Internal communication channels:** Methods used to exchange information within an organization. These may include the intranet, SharePoint, Microsoft Teams, and Microsoft Outlook.

## 6. REFERENCES:

a. 29 U.S.C. § 794d. Electronic and information technology.

b. 48 C.F.R. § 39.2. Information and Communication Technology.

c. 36 C.F.R. Part 1194, Information and Communication Technology Standards and Guidelines.

d. VA Acquisition Regulation (VAAR) Subpart 839.2 – Information and Communication Technology.

e. VA OIG 22-03909-19, Office of Inspector General, Office of Audits and Evaluations, VA Should Enhance its Oversight to Improve the Accessibility of Websites and Information Technology Systems for Individuals with Disabilities, January 17, 2024.

## APPENDIX A

## AUTHORITIES AND RESOURCES RELATED TO ICT ACCESSIBILITY

a. **Communications Act of 1934, 47 USC § 255 (1996):** Section 255 of the Communications Act requires telecommunications products and services to be accessible to people with disabilities. This is required to the extent access is “readily achievable”, meaning easily accomplishable, without much difficulty or expense.

b. **Section 508 of the Rehabilitation Act of 1973:** In 1998, Congress amended the Rehabilitation Act of 1973 to require federal agencies to make their electronic and information technology (EIT) accessible to people with disabilities. The law [29 U.S.C § 794 \(d\)](#) applies to all federal agencies when they develop, procure, maintain, or use electronic and information technology. Under Section 508, agencies must give disabled employees and members of the public access to information comparable to the access available to others.

c. **Revised Section 508:** The Revised 508 Standards and 255 Guidelines, ensure equal access to technologies for individuals with disabilities by setting technical accessibility requirements. They were updated in 2017 to reflect advancements and adopt globally recognized standards like the World Wide Web Consortium's (W3C) Web Content Accessibility Guidelines (WCAG) 2.0.

d. **Federal Acquisition Regulation (FAR); Electronic and Information Technology Accessibility, 48 CFR. § 39.2 [FAC 97-27; FAR Case 1999-607]:** FAR 48 CFR § 39.2, also known as the "Electronic and Information Technology Accessibility" clause, is a regulation that ensures that all ICT procured by the U.S. federal government is accessible to people with disabilities. This includes both federal employees and members of the public. The clause explicitly states its purpose: "This subpart implements section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d)," clearly establishing its link to the statutory mandate.

e. **FAR Subpart 39.2:** This regulation ensures that all ICT procured by the federal government complies with accessibility standards, implementing the requirements of Section 508 in the context of government acquisitions.

f. **M-24-08 Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act (OMB).** M-24-08 is a recent government memorandum that mandates improved accessibility of digital technology across federal agencies. To achieve this, it requires designation of program managers for overseeing accessibility efforts, implementation of plans to assess and address shortcomings in websites and Information Technology (IT) systems, and the procurement of technology that's accessible to everyone, including people with disabilities. This initiative ultimately aims to make government services and information more inclusive and user-friendly.

g. **Executive Order 14035, Diversity, Equity, Inclusion, and Accessibility in Federal Workforce (2021):** This executive order seeks to create a Government-wide initiative to promote diversity, equity, inclusion, and accessibility (DEIA).

h. **VA Acquisition Regulation (VAAR):** The Department of Veterans Affairs (VA) integrates Section 508 into its acquisition processes through dedicated subparts,

contractual requirements, and references to relevant directives and resources. This ensures that accessibility remains a core consideration throughout the VA's ICT procurement cycle.

i. **VA Directive 6221:** A department-wide policy within VA that establishes the agency's commitment to ensuring that its ICT is accessible to, and usable by, VA employees and members of the public with disabilities. This aligns with the goals of Section 508 of the Rehabilitation Act of 1973, which mandates accessibility in federal agencies' ICT.

j. **VA Directive 6102:** A department-wide policy within VA that establishes the website and web application content management, technical management, best practices, standards, and requirements for federal regulatory or policy, departmental policy, or standards change.



**APPENDIX B**  
**NCA SECTION 508 PROCEDURAL GUIDANCE**

1. For inquiries regarding Section 508 compliance, training opportunities, remediation assistance, document audits, or general information about the Section 508 law, contact the NCA Section 508 Program Coordinator directly by email: [NCA508@va.gov](mailto:NCA508@va.gov). Types of support available:

a. **Training Information:** NCA's Section 508 Program Coordinator can advise which training is appropriate and recommended on a case-by-case basis. NCA employees can begin with TMS course "Section 508: What is it and Why is it Important (VA 4565345)" as an introduction or contact the NCA 508 team for more training options.

b. **Remediation Assistance:** The NCA Section 508 Program Coordinator will assist employees who need document remediation tools with requesting software services from VA OIT and provide support for training and use of remediation software tools. In addition, NCA employees can submit documents for remediation through the NCA Section 508 Toolkit portal. Please contact the team at the email above for the SharePoint link to submit requests.

c. **General Information:** The NCA Section 508 Program Coordinator is available for consulting with NCA staff regarding the implications of Section 508 regulations for NCA digital content.

d. **Remediation Tools:** The NCA Section 508 Program Coordinator will assist NCA employees with requests to VA OIT for remediation and testing tools and can advise on training related to these applications.

2. **Content Owner Coordination:** NCA's Section 508 Program Coordinator will collaborate with NCA's Web Content Management team and content owners to remediate content on NCA's public-facing website, intranet, and SharePoint platforms as needed. Content owners will be contacted when accessibility issues are identified.

3. **Outlook Email Accessibility:** To ensure internal email communications are compliant, employees should do the following:

a. When ready to send an email message using Microsoft Outlook, click on the "Review" tab, then click the "Check Accessibility" button.

b. Review the accessibility inspection results. If the results indicate no accessibility issues found, click "Send".

c. If there are accessibility issues, the inspection results will display a warning. Click on the arrows to see each warning and follow the instructions provided for addressing each issue.

**4. Microsoft Office and Adobe Acrobat Accessibility.**

a. As of September 2024, VA uses CommonLook Office to create accessible PDFs directly from Microsoft Office applications. It is an add-in tool that enables authors to design such documents with accessibility in mind. Additionally, VA uses CommonLook PDF to test and repair PDF documents, simplifying the remediation process to ensure compliance with accessibility standards.

b. NCA employees who want to use CommonLook can take the following introductory courses available in VA's Talent Management System (TMS). Installation of Adobe Acrobat Pro, CommonLook Office and CommonLook PDF are required (contact VA OIT to request) and intermediate or advanced knowledge in Microsoft Office and Adobe Acrobat is recommended.

(1) Introduction to CommonLook Office, VA 4458925 (Recommended for Word, Excel, PowerPoint documents).

(2) Creating Accessible Documents Using CommonLook PDF Part 1 and Part 2, VA 4458923 (part 1), VA 4456849 (part 2).

(3) Miscellaneous Tips and Tricks Using CommonLook, VA 464193.

**5. Digital Content in SharePoint and Teams.** As of September 2024, VA has not implemented accessibility audits for content on SharePoint and Microsoft Teams. However, if you believe your office has content on these platforms that may require Section 508 remediation, please reach out to the NCA Section 508 Program Coordinator for assistance.