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National Geospatial-Intelligence Agency

INSTRUCTION

NUMBER 8400.4

05 July 2017

Administrative Update 2, 10 March 2025

CIO-T

SUBJECT: Implementation of Electronic and Information Technology
Accessibility/Section 508 Program

References: See Enclosure 1.

1. PURPOSE. This Instruction:

a. Establishes policy, assigns responsibilities, and provides procedures for the implementation and governance of the Electronic and Information Technology (EIT) Accessibility Program (also known as the Section 508 Program).

b. Rescinds NGA Instruction ~~(NGAI)~~ 8400.4, "Implementation of Section 508 of the Rehabilitation Act," 02 May 2013.

2. APPLICABILITY. This Instruction, hereinafter referred to as *Section 508*, applies to all NGA civilian employees, military service members, other Government agency personnel assigned to NGA, and contractors, hereinafter referred to as personnel.

3. DEFINITIONS. See Glossary.

4. POLICY. It is NGA policy to:

a. Ensure all EIT (i.e., computers or telephones) is accessible to people with disabilities in accordance with (IAW) References (a) and (b).

b. Implement and manage an EIT Accessibility Program to ensure Section 508 compliance.

c. Ensure accessibility and universal usability to all EIT that is developed, procured, maintained, or used by the Agency.

d. Certify EIT accessibility IAW References (a) and (b).

5. RESPONSIBILITIES. See Enclosure 2.

6. PROCEDURES. See Enclosures 3-8.

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7. EFFECTIVE DATE. This Instruction is effective on the date of signature.



for Tanya Pemberton
Chief Information Officer

Enclosures

1. References
2. Responsibilities
3. Procedures for Developing Accessible EIT
4. Procedures for Procuring Accessible EIT
5. Procedures for Maintaining Use of Accessible EIT
6. Procedures for Developing Accessibility Training
7. Procedures for Funding EIT Accessibility
8. Procedures for Initiating an Administrative Complaint

Glossary

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CHANGE LOG

Change	Change Date	Revised By	Pages Affected	Change Description
1-1	1/24/2020	CIO-T	13	Removed "CIO-T Official" for clarity. The CIO-T Official is the Section 508 Coordinator.
1-2	1/24/2020	CIO-T	13	Clarified who signs the Form 5115-4 and for what purpose.
2-1	3/10/2025	DXCI	1	Updated the establishment and use of acronyms.
2-2	3/10/2025	DXCI	3	Updated Table of Contents.
2-3	3/10/2025	DXCI	5	Updated References.
2-4	3/10/2025	DXCI	6, 9-10, 12-13, 17	Updated Component Directors to Component Heads and deleted Agency Element (AE) Leads.
2-5	3/10/2025	DXCI	7-9, 17-18	Organizational Name Change.
2-6	3/10/2025	DXCI	7, 12	Updated referencing.

ENCLOSURE 1

REFERENCES

- (a) 29 United States Code (USC) Section 794d, "~~Electronic and Information technology Workforce Investment Act of 1998~~," (Section 508 of the Rehabilitation Act of 1973, as amended)
- (b) 40 USC Section 1452, Section 5142, Clinger-Cohen Act of 1996, 10 February 1996
- (c) Title 36, Code of Federal Regulations Part 1194, "Electronic and Information Technology Accessibility Standards," 21 December 2000
- (d) Office of Management and Budget Memorandum, "Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act," 24 January 2013
- (e) DoD Manual 8400.01-~~M~~, "~~Accessibility of Information and Communications Technology (ICT) Procedures for Ensuring the Accessibility of Electronic and Information Technology (EIT) Procured by DoD Organizations~~," 14 November 2017
~~03 June 2011~~
- (f) NGA Instruction 1020.2, "Reasonable Accommodation and Personal Assistance Services," 24 September 2020 ~~01 October 2005~~
- (g) NGA Form 5115-4, "Section 508 Determination for Purchase Requests,"
March ~~01 May~~ 2012
- ~~(h) NGAD 1405, "Employment and Placement," 18 May 2015~~
- ~~(i) NGA Memorandum for Record, U-2016-02349, "Delegation of Authorities,"
13 September 2016~~
- (h j) Web Content Accessibility Guidelines 2.0 (WCAG 2.0),
<https://www.w3.org/TR/WCAG20>, 11 December 2008

ENCLOSURE 2

RESPONSIBILITIES

1. Director, NGA (D/NGA).

a. Establishes the NGA EIT Accessibility Program IAW References (a), (d), and (e).

b. Designates the ~~Director~~, Chief Information Officer ~~and Director, Information Technology (IT)~~ Services (D/CIO-T) as the Senior Designated Officer for EIT who is responsible for ensuring compliance IAW References (a) through (e).

2. D/CIO-T.

a. Oversees and maintains accountability for the EIT Accessibility Program.

b. Ensures the EIT Accessibility Program is established and implemented IAW References (a), (d), and (e).

c. Ensures accessibility requirements are incorporated into the planning, operation, and management of EIT that is developed, procured, maintained, or used by the Agency.

d. Collaborates with the Component Acquisition Executive (CAE) and Director, Office of Contract Services (D/OCS) to ensure that accessibility requirements are included in EIT acquisition and procurement.

e. Provides a joint or coordinated transmittal memorandum with the CAE IAW Reference (e) asserting that IT investments are consistent with Reference (a).

f. Appoints and assigns responsibility to a Section 508 Coordinator to provide program leadership and management of the EIT Accessibility Program.

g. Maintains policies and guidebooks, disseminates best practices, and pursues accessibility and universal usability in the development, procurement, and maintenance of EIT.

h. Ensures that EIT acquisition processes and procedures are IAW References (c) and (e).

i. Ensures the procurement and development of accessible EIT in collaboration with Component ~~Heads Directors, Agency Element (AE) Leads,~~ and Program Managers.

j. Facilitates staffing, funding, and implementation of EIT Accessibility Program initiatives.

3. CAE.

- a. Ensures that EIT acquisition review processes include accessibility requirements.
- b. Collaborates with D/OCS and D/CIO-T to ensure compliance with Reference (a) in all EIT procurement request packages.
- c. Collaborates with the D/OCS to ensure that accessibility requirements are included in EIT acquisition and procurement.
- d. Provides a joint or coordinated transmittal memorandum with the D/CIO-T IAW Reference (e) asserting that IT investments are consistent with Reference (a).

4. Director, Office of ~~Diversity Management and~~ Equal Employment Opportunity (D/~~EEO~~ ~~ODE~~).

- a. Assists in the development of user engagement programs in coordination with the Section 508 Coordinator.
- b. Ensures the Agency is responsive to the requests and complaints of personnel with disabilities via the reasonable accommodation program IAW Reference (f).
- c. Assists with the implementation and funding of accessibility in the workplace IAW Reference (f).
- d. Collaborates with the EIT Accessibility Team on recommendations from employees, recruiters, and hiring events regarding how to make the Agency a more accessible environment for personnel with disabilities.

5. Director, Human Development (D/HD).

- a. Provides input on the Agency's recruitment practices for people with disabilities.
- b. Recruits and hires qualified people with disabilities ~~IAW Reference (h)~~.
- c. Collaborates with the EIT Accessibility Team on recommendations from employees, recruiters, and hiring events regarding making the Agency a more accessible environment for personnel with disabilities.
- d. Develops and maintains Section 508 awareness training in collaboration with the Section 508 Coordinator.
- e. Ensures that training provided by the NGA College is accessible to personnel with disabilities.

f. Provides guidance, subject-matter expertise, and advice on Section 508 training and education initiatives to the EIT Accessibility Team.

6. D/OCS.

a. Provides guidance to contracting officers to ensure that acquisition strategies are in compliance with Reference (a).

b. Assists with updating procurement policies and procedures to ensure consistency with US Access Board standards IAW Reference (c).

c. Ensures that undue burden documentation is provided and included in the contract file, when appropriate, IAW Reference (a).

d. Ensures that market research is performed during the acquisition planning phase.

7. Director, Office of Corporate Communications (D/OCC).

a. Ensures, in collaboration with all appropriate stakeholders, that all Agency public and user-facing communications are accessible.

b. Collaborates with EIT Accessibility Team on the communication strategy for all publications regarding accessibility-related topics including educational and training materials.

c. Assists in the implementation and funding of workplace accessibility upon availability of funds.

8. General Counsel (GC).

a. Determines legal compliance with Section 508.

b. Ensures an efficient and accessible method for handling Section 508 administrative complaints is established.

9. Director, Research and Development (D/R&D).

a. Supports Agency efforts to build partnerships with the public sector, private sector, and academia that add value to accessibility and usability efforts.

b. Assists the EIT Accessibility Team with developing solutions for unique accessibility challenges on a discretionary basis.

10. Director, Security and Installations (D/SI), with collaboration from all stakeholders, provides input and subject matter expertise on environmental issues related to Section

508 accessibilities to the EIT Accessibility Team.

11. Special Emphasis Program Leads, Equality Executives, and Senior Champions.

- a. Provide guidance to the Section 508 Coordinator and EIT Accessibility Team.
- b. Identify and advocate solutions for EIT accessibility barriers throughout the Agency.
- c. Provide insight and advice on Agency culture and support for accessibility.
- d. Assist with personnel engagement and outreach to provide information on accessibility in the work environment.

12. Component ~~Heads~~ ~~Directors~~, ~~AE Leads~~, and PMs.

- a. Ensure compliance with Reference (a).
- b. Ensure all applicable personnel are trained on compliance and accessibility IAW Reference (a).
- c. Provide the Section 508 Coordinator with feedback about the effectiveness of Section 508 training courses.
- d. Implement and fund Section 508 compliance for programs within their purview.
- e. Ensure that compliance and accessibility performance goals are cascaded down through second- and first-line supervisor performance plans.

13. Section 508 Coordinator.

- a. Ensures EIT accessibility requirements are integrated into NGA's strategic, budget, and IT capital plans.
- b. Develops and implements processes and procedures for monitoring Agency adherence to Reference (a) IAW Reference (e).
- c. Develops user engagement programs in coordination with D/~~EEO ODE~~.
- d. Manages EIT Accessibility Program staff and funding.
- e. Establishes and leads an EIT Accessibility Team made up of points of contact/participants from CIO-T, ~~EEO ODE~~, HD, OCS, OCC, GC, SI, R&D, Deaf and Hard of Hearing Council, People with Disabilities Council, other interested parties, and stakeholders.

f. Develops a charter for the EIT Accessibility Team and assigns responsibilities to team members according to their respective areas of expertise.

g. Responds to EIT accessibility complaints and issues and prepares reports pertaining to those complaints and issues.

h. Promotes EIT accessibility awareness throughout the Agency and conducts briefings for stakeholders.

i. Provides training content for EIT accessibility and collaborates with HD to develop computer-based training.

j. Develops compliant and efficient procedures for the acquisition of accessible EIT, approves exceptions, and provides guidance and recommendations to Component ~~Heads Directors, AE Leads,~~ and PMs who develop, procure, maintain, or use EIT.

k. Identifies needs for accessible systems, adaptive technology, and EIT deficiencies in both current and prospective EIT systems that impact the performance of personnel with disabilities.

l. Identifies NGA work environment accessibility issues, assists with writing problem statements to describe issues, and coordinates with the stakeholders to find funding and/or creative solutions for accessibility issues.

14. EIT Accessibility Team

a. Assists with the understanding and implementation of accessibility measures throughout the Agency by leveraging the knowledge, perspective, and experience of different Components, ~~AEs,~~ and PMs to resolve accessibility issues within NGA.

b. Supports the Section 508 Coordinator with integrating accessibility needs into Agency strategic, budget, and IT capital plans.

c. Identifies Agency needs for accessible systems, adaptive technology, and EIT deficiencies in both current and prospective EIT systems that impact the performance of personnel with disabilities.

d. Participates in EIT accessibility monitoring, measurement, and disclosure activities.

e. Supports the validation of accessible EIT system performance prior to development.

f. Provides recommendations and expertise to the Section 508 Coordinator regarding implementation issues and solutions.

g. Supports the development of policies and procedures to ensure compliance with Reference (a).

15. Requiring Officials.

a. Conduct market research to ensure procurement of the most accessible product at best value.

b. Make EIT procurements on behalf of the Agency.

c. Track and document the Section 508 compliance status of each EIT procurement made.

d. Ensure that Section 508 compliance records are made available to the Section 508 Coordinator upon request.

16. Personnel, if applicable, initiate a Section 508 administrative complaint IAW Enclosure 8.

ENCLOSURE 3

PROCEDURES FOR DEVELOPING ACCESSIBLE EIT

1. Requirements. Personnel involved in managing EIT development (e.g., Component ~~Heads Directors, AE Leads,~~ and PMs) ensure EIT is accessible by including accessibility language in all service requests, contracts, performance work statements, and any document that captures requirements relating to the EIT development. The language must satisfy the requirement for contractors to ensure EIT compliance as directed in Reference (a), specifically that vendors providing EIT may use Reference (c), Reference (h j), or use alternative designs or technologies that provide equal or greater access to and use of the product for persons with disabilities.

2. Testing. Personnel involved in managing EIT development also ensure that EIT is accessible by testing the products to confirm that the vendors have delivered the requested service or system. PMs ensure vendors include requirements for accessibility in EIT test cases. Accessibility compliance is identified in factory acceptance tests, initial tests, and independent verification and validations. Accessibility results are published with the general test results and are included in the production lifecycle of the product. The Section 508 Coordinator tracks program progress on accessibility by requesting accessibility results at different points in production.

ENCLOSURE 4PROCEDURES FOR PROCURING ACCESSIBLE EIT

1. Certification. The Section 508 Coordinator has the authority to certify compliance and approve exemptions for EIT procurements. In practice, these decisions are made as a result of a joint effort with other Components ~~or AEs~~ throughout the Agency. The Requiring Officials complete NGA Form 5115-4 by answering the questions on the form to the best of their knowledge while attempting to obtain missing or unknown information. The Requiring Officials then sign and forward the form to the Section 508 Coordinator. In addition, Requiring Officials obtain a Section 508 Voluntary Product Assessment (VPAT) from the vendor to ensure Section 508 compliance. Requiring Officials request guidance from the Section 508 Coordinator for any questions about compliance concerning either NGA Form 5115-4 or the VPAT. Requiring Officials then sign and forward the NGA Form 5115-4 to the Section 508 Coordinator and OCS.

2. Tracking of Compliance. The Requiring Officials track the compliance status of EIT by including the VPAT and NGA Form 5115-4 in the procurement package that is sent to OCS. Requiring Officials also maintain copies of the VPAT and NGA Form 5115-4 for their records. The Section 508 Coordinator retains a copy of NGA Form 5115-4 and can request copies of the VPAT from Requiring Officials or OCS.

3. Exemptions. While it is in the best interest of the Agency to pursue accessibility for every EIT product developed, procured, maintained, or used by the Agency, there are some exemptions. In the event of an exemption, the Requiring Official completes NGA Form 5115-4, identifies the program, and provides an explanation that supports the claim of exemption, and obtains the Section 508 Coordinator signature for exemption approval. Even with an exemption, Requiring Officials request accessible products from vendors, request a VPAT from the vendor, and document whether they can provide one. The exemptions are:

a. National Security Systems for which the function, operation, or use involves intelligence activities, cryptologic activities related to national security, command and control of military forces, equipment that is an integral part of a weapon or weapon system; or systems which are critical to the direct fulfillment of military or intelligence missions. Systems that are critical to the direct fulfillment of military or intelligence missions do not include a system that is to be used for routine administrative and business applications (including payroll, finance, logistics, and personnel management applications). (Reference (b))

b. The EIT acquisition is:

(1) For service and/or service maintenance agreements (for technical support, not software maintenance agreements).

(2) Acquired by a contractor for use that is incidental to the contract.

(3) Located in spaces frequented only by service personnel for equipment maintenance, repair, or occasional monitoring of equipment.

(4) Provided for telecommunications services and not contractor-provided terminal equipment (telecommunications products). (Reference (a))

c. An undue burden EIT acquisition exemption may be claimed IAW Reference (a). The Requiring Official completes NGA Form 5115-4 and provides a justification for undue burden and coordinates with the GC before submitting NGA Form 5115-4. All undue burden exemption requests are forwarded to the Section 508 Coordinator for final review. The justification includes:

(1) The products or services required.

(2) The dollar value of the acquisition.

(3) The otherwise applicable technical provision that cannot be met.

(4) The market research performed to locate commercial items that meet applicable standards and the specific reasons why the technical provision cannot be met.

(5) The significant difficulty or expense that would be incurred in order to comply with the accessibility standard. If the expense is deemed prohibitive by the Requiring Official, the estimation method for cost must be included. In addition, the insufficient Agency resources available to the office or program for which the product or service is being acquired must be described.

(6) The alternative means by which the Agency provides access to the data and information to personnel with disabilities.

(7) If the justification is lacking any of the above elements, is incomplete, or is unsupportable according to the GC, the request for exemption is denied by the Section 508 Coordinator.

ENCLOSURE 5

PROCEDURES FOR MAINTAINING USE OF ACCESSIBLE EIT

1. User Engagement. The Section 508 Coordinator ensures that the Agency maintains and uses accessible EIT by continuously monitoring the use of EIT throughout the Agency. This is accomplished by working in collaboration with disability advocates such as the Deaf and Hard of Hearing Council, People with Disabilities Council, Wounded Warriors, and Component Equality Executives to gain information about the everyday work experience of people with disabilities when they engage with EIT. The Section 508 Coordinator uses this information to assess the overall accessibility of the Agency, write problem statements, and raise personnel awareness of areas for improvement.
2. Metrics. The Section 508 Coordinator uses information gained from user engagement, accessibility testing, and accessibility procurement to create metrics that illustrate the overall accessibility standing for EIT maintained and used by the Agency.

ENCLOSURE 6

PROCEDURES FOR THE DEVELOPING ACCESSIBILITY TRAINING

The Section 508 Coordinator conducts research and collaborates with HD staff to develop computer-based training for personnel that have various levels of engagement with EIT and accessibility. Training covers topics that:

1. Teach general awareness of Section 508 and its requirement to ensure that all EIT is accessible.
2. Illustrate the best way to ensure the procurement of accessible EIT including how to determine exemptions, how to verify accessibility with vendors, and how to complete NGA Form 5115-4.
3. Describe the best way to develop accessible EIT.
4. Recommend the best way to design software that is compatible with assistive technology.
5. Show how to recognize barriers for disabilities such as hearing loss, color blindness, and motor disabilities.

ENCLOSURE 7PROCEDURES FOR FUNDING EIT ACCESSIBILITY

1. Funding for Agency Initiatives. Component ~~Heads Directors, AE Leads, Portfolio Leads,~~ and PMs fund Section 508 needs by ensuring that vendors providing EIT fulfill accessibility requirements as written in their statement of work and paying for accessible capabilities as the vendor provides them. However, there are EIT projects associated with the overall accessibility of the NGA work environment and not with the individual efforts of any particular program, portfolio, ~~AE,~~ or Component. These initiatives are in response to requests made by personnel with disabilities or are the result of an assessment by the Section 508 Coordinator. If centralized funding is made available by the D/NGA and/or the D/CIO-T to pay for accessibility initiatives, the Section 508 Coordinator may use the funds to complete accessibility upgrades on behalf of the Agency. If centralized funding is not available or funding has been depleted, funds may come directly from CIO-T in satisfaction of a reasonable accommodation request filed through ~~EEO ODE~~ pursuant to Reference (f).
2. This guidance shall not be interpreted to rescind, revoke, or replace ~~EEO ODE's~~ role and responsibility concerning Interpreting Services IAW Reference (f) or any other responsibility ~~EEO ODE~~ has to fund services concerning personnel with disabilities.

ENCLOSURE 8

PROCEDURES FOR INITIATING AN ADMINISTRATIVE COMPLAINT

1. Initial Request. Personnel who have concerns about accessibility submit an administrative complaint to the Section 508 Coordinator. The Section 508 Coordinator:

a. Creates a problem statement and makes an attempt to resolve the issue by bringing it to the attention of CIO-T leadership.

b. Coordinates with stakeholders within CIO-T and other Components, such as **EEO ODE**, to formulate a resolution.

c. Provides feedback and status updates to the requestor detailing progress toward resolving the issue.

2. Lack of resolution. If the individual is dissatisfied with Agency efforts to resolve the issue, the individual can file an informal ~~Equal Employment Opportunity (EEO)~~ complaint with **EEO ODE**.

3. If the informal complaint remains unresolved, the individual can file a formal EEO complaint and have the complaint investigated IAW Reference (f).

4. The GC supports the formal complaint process by providing legal guidance and assisting the parties to come to a satisfactory resolution.

GLOSSARY

Accessibility	The design of products, devices, services, or environments for people who experience disabilities. The concept of accessible design and practice of accessible development ensures both unassisted access and compatibility with assistive technology. (Reference (a))
Assistive Technology	Includes assistive, adaptive, and rehabilitative devices that promote greater independence by providing enhancements to or changing methods of interacting with technology to make it easier for people to perform tasks that they may have been unable to accomplish or have great difficulty in accomplishing. (Reference (c))
Electronic and Information Technology (EIT)	Commonly referred to as IT but is an expansion upon the accepted definition of IT because it includes any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information. EIT includes IT products (such as computers, software, and ancillary equipment), telecommunications products (such as telephones), information kiosks, transaction machines, websites, multimedia, and office equipment (such as copiers and fax machines). (Reference (c))
Information Technology (IT)	Any equipment or interconnected system or subsystem of equipment that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. IT includes computers, ancillary equipment, software, firmware and similar procedures, services (including support services), and related resources. (Reference (c))
Requiring Official	Any Government official who is participating in the procurement of EIT. Requiring Officials participate in the determination of Section 508 relevance, technical performance, and functional requirements. They also conduct market research and help to ensure that accessibility language is included in all requests for service, contracts, performance work statements, and/or any document that captures requirements related to EIT procurement. (Definition created by NGA for NGA purposes only)
Undue Burden	Significant difficulty or expense. In determining whether an action would cause an undue burden, an agency shall consider all agency resources available to the program or component for which the product is being developed, procured, maintained, or used. (Reference (c))

Universal
Usability

The broad spectrum of ideas meant to produce EIT that is inherently accessible to all people regardless of age or ability. A program that provides universal usability greatly increases the ease of use by which EIT can be leveraged to accomplish tasks with effectiveness, efficiency, and satisfaction. Universal usability ultimately drives and molds innovation. The goal of the EIT Accessibility Program is to move from Section 508 compliance, to accessibility, to universal usability. (Definition created by NGA for NGA purposes only)