



DTRA INSTRUCTION 1020.02

IMPLEMENTATION OF SECTION 508 OF THE REHABILITATION ACT OF 1973

Originating Component:	Information Technology
Effective:	May 19, 2025
Releasability:	Cleared for public release. Available on the DTRA/ Portal issuances library at https://dtra1portal.unet.dtra.mil/CS/IssuanceLib/Pages/iLib.aspx .
Reissues and Cancels:	DTRA Instruction 1020.02, "Implementation of the Section 508 of the Rehabilitation Act of 1973," April 18, 2014, as amended
Approved by:	Hunter Lutinski, SES, Acting Executive Director

Purpose: This issuance:

- Establishes policy, assigns responsibilities, and outlines procedures for the implementation of Section 508 of the Rehabilitation Act of 1973.
- Provides guidance for the Defense Threat Reduction Agency (DTRA) in developing, procuring, maintaining, or using information and communications technology (ICT), as well as publishing digitally accessible content, products, and systems, in accordance with (IAW) Section 794d of Title 29, United States Code, also known and referred to in this issuance as "Section 508" (S508). S508 confirms content and ICT interfaces are accessible to all, including individuals with disabilities. ICT must be fully interoperable with assistive technology (AT).

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SECTION 1: GENERAL ISSUANCE INFORMATION

1.1. APPLICABILITY.

This instruction applies to all entities of DTRA and takes precedence over all related internal standard operating procedures or guidance.

1.2. POLICY.

DTRA provides individuals with disabilities, DTRA employees, and members of the public seeking information or services from DTRA (via websites, documents, etc.), access to information comparable to information afforded persons without disabilities. This includes all ICT and digital content the Agency or another entity developed, procured, operated, published, or maintained directly on behalf of DTRA in compliance with S508 laws, regulations, standards, and guidance.

SECTION 2: RESPONSIBILITIES

2.1. DIRECTOR.

The Director:

- a. Appoints, in writing, and delegates to the S508 Program Manager (PM) sufficient authority and resources to execute assigned responsibilities IAW the February 29, 2024 DoD Chief Information Officer Memorandum. The Director may delegate this appointment authority to the Chief Information Officer.
- b. Determines, in coordination with the Office of the General Counsel, when S508 compliance with Architectural and Transportation Barriers Compliance Board (U.S. Access Board) standards impose an undue burden to the Agency at-large.

2.2. CHIEF INFORMATION OFFICER.

The Chief Information Officer:

- a. Incorporates S508 digital accessibility considerations into the planning, management, and operation of any ICT that DTRA develops, procures, maintains, or uses.
- b. Addresses S508 challenges to resolve ICT digital accessibility issues before they adversely affect mission and mission support functions.
- c. Supports the development of ICT policies and procedures that address S508 and digital accessibility.

2.3. S508 PM.

The S508 PM:

- a. Monitors and assesses DTRA's adherence to S508 policies and procedures.
- b. Oversees DTRA's S508 implementation plans, program policy, and best practices.
- c. Coordinates S508 actions with a Digital Accessibility Team of Agency stakeholders, such as directorate and staff office S508 points of contact, PMs, and system owners.
- d. Produces, coordinates, and submits DTRA's annual S508 assessment report to DoD and the General Services Administration (GSA).
- e. Participates in DoD, GSA, or other U.S. Government (USG) forums to keep apprised of S508 requirements, standards, and best practices.

f. Identifies timely and relevant S508 training and coordinates with the Human Resources Directorate for release to Agency personnel.

g. Recommends courses of action for the Chief Information Officer's consideration of requests for exception to S508 digital accessibility standards and maintains records of each exception request and approval for audit purposes.

2.4. S508 DIGITAL ACCESSIBILITY TEAM.

The S508 Digital Accessibility Team:

a. Communicates to the DTRA workforce the importance of, and their individual roles in, developing and maintaining digitally accessible content, products, and systems to the overall effectiveness and efficiency of Agency.

b. Implements and disseminates information regarding updates on digital accessibility policy, guidelines, and best practices.

c. Reviews and evaluates project implementation plans and strategies to confirm S508 requirements are adequately addressed and advises the S508 PM of any issues.

d. Identifies organization specific S508 issues and develops remediation plans.

2.5. EQUAL EMPLOYMENT OPPORTUNITY OFFICE.

The Equal Employment Opportunity Office:

a. Defines, manages, operates, and maintains metrics for the S508 complaints process.

b. Processes complaints involving ICT non-compliance with S508.

c. Coordinates with the S508 PM on equal employment opportunity S508 efforts.

d. Confirms the DTRA S508 accessibility statement is current, based on DoD requirements, and provides it to the Public Affairs Office for displaying on externally facing ICT interfaces.

2.6. PUBLIC AFFAIRS OFFICE.

The Public Affairs Office:

a. Confirms all DTRA information made available for public consumption in any form, including information released on DTRA websites, is S508 compliant.

b. Verifies the S508 accessibility statement provided by the Equal Employment Opportunity Office is S508 compliant and prominently displayed on externally facing ICT interfaces.

2.7. DIRECTOR, HUMAN RESOURCES.

The Human Resources Director:

- a. Incorporates disability and digital accessibility requirements into DTRA orientation programs to promote S508 awareness.
- b. Includes S508 awareness in existing Learning Management System (LMS) training.
- c. Verifies all training in LMS is S508 compliant, in coordination with the content owner.
- d. Integrates S508 considerations into leadership and management performance plans.

2.8. DIRECTOR, ACQUISITION, CONTRACTS, AND LOGISTICS.

The Acquisition, Contracts, and Logistics Director:

- a. Identifies and incorporates, in coordination with the S508 PM, S508 training into DTRA PM certification requirements.
- b. Develops and maintains standardized S508 contract language that contracting officers may tailor to meet specific contract requirements.
- c. Directs contracting officers and procurement officials to:
 - (1) Confirm work statements and purchase requests from PMs and Program Officers address S508 requirements and include applicable contract clauses, terms, and conditions, IAW Volume 1, Subparts 39.2, 39.203(C)(2), and 10.001 of Subchapters B and F of the Federal Acquisition Regulation (FAR), and DoD Instruction 5000.82.
 - (2) Verify the PM or Program Officer has included the S508 documents in the contract file. This includes market research, product specifications, Accessibility Conformance Report (ACR), Voluntary Product Accessibility Template (VPAT), vendor attestations, and digital accessibility test results.
 - (3) Confirm technical evaluations include digital accessibility as an evaluation factor.
 - (4) Assist PMs with market research for S508 ICT requirements.
 - (5) Confirm the acquisition of ICT products and services meets S508 ICT digital accessibility standards.
 - (6) Work with contractor officer representatives, as part of quality assurance, to:
 - (a) Verify applicable contract deliverable requirement lists are S508 conformant.
 - (b) Verify S508 compliance of ICT products or services before purchase and acceptance of delivery.

(c) Communicate to vendors and contractors the requirements for ICT to conform with S508.

2.9. DIRECTORS OF THE DIRECTORATES AND STAFF OFFICE CHIEFS.

The directors of the directorates and staff office chiefs:

- a. Implement and oversee directorate or staff office compliance with this instruction.
- b. Establish appropriate management controls and provide sufficient resources to incorporate S508 requirements within their organization.
- c. Provide or request sufficient resources to identify, test, validate, and remediate any digital accessibility issues within their organization.
- d. Support their respective organization's participation in the S508 Digital Accessibility Team.
- e. Integrate ICT digital accessibility skill competencies into professional development plans for all members.
- f. Direct program managers to:
 - (1) Identify which S508 standards do and do not apply to all procurement actions, using GSA's website at: <https://www.section508.gov>.
 - (2) Perform market research to determine the availability of compliant products and services.
 - (3) Address digital accessibility requirements within program technical specifications based on the market research and Agency needs.
 - (4) Prepare ICT requirements documents for placement of task or delivery orders.
 - (5) Maintain in the product procurement file documentation (i.e., Market Research, ACR, VPAT, technical specifications) that confirms procured ICT is compliant with S508 digital accessibility standards.
 - (6) Address digital accessibility requirements early in the development cycle to help guarantee digital accessibility and compliance with S508 standards.
 - (7) Seek assistance from the S508 PM and the contracting officer early in the requirements process, when necessary.
 - (8) Confirm that statements of work include S508-related requirements, as well as a statement of the U.S. Access Board standards that apply or do not apply.

(9) Coordinate with the S508 PM regarding any questions regarding policy or the policy exceptions approval process.

g. Direct system owners to:

(1) Confirm compliance of their systems with S508 digital accessibility standards.

(2) Include accessibility in system planning, design, development, and testing.

(3) Verify the accuracy of their system's S508 compliance status in the DoD Information Technology Portfolio Repository (DITPR), IAW the October 31, 2023 DoD Chief Information Officer Memorandum.

(4) Provide a S508 Master Test and Remediation Plan to the S508 PM for systems registered in DITPR that requires testing and keeping the plan updated.

h. Direct content managers to:

(1) Verify testing, both manually and by automated means, is done to confirm all digital content developed for others' consumption or use is accessible IAW relevant S508 requirements. Examples of such digital content include web pages, images, working documents on shared drives, files attached to or embedded within emails, final products delivered to Public Affairs Office for public dissemination, etc.

(2) Provide the S508 Digital Accessibility Team with the test results data necessary to assess the status of S508 content IAW relevant criteria established by the U.S. Access Board in their ICT Accessibility S508 Standards document (<https://www.access-board.gov/ict>).

i. Direct government purchase card holders and approving officials to:

(1) Evaluate and procure only ICT products that are S508 compliant based on standards found at: <https://www.access-board.gov>.

(2) Provide documentation identifying how ICT products conform to S508 standards. This may include market research, ACR, VPAT, specifications, or other documentation.

(3) Coordinate with the S508 PM regarding any policy questions and the policy exceptions approval process.

j. Direct software and web developers to:

(1) Verify digital accessibility requirements are incorporated early in the development cycle to guarantee compliance with S508 standards and to avoid unnecessary costs or rework.

(2) Confirm all user interfaces are S508 compliant (tests should specifically assess the interface structure, metadata and meta tags for titles, description, keywords, and stacked headline requirements).

SECTION 3: PROCEDURES

3.1. S508 EXCEPTIONS.

a. Exceptions to S508 Digital Accessibility Standards.

(1) Requests for exceptions to S508 digital accessibility standards are submitted to the S508 PM and must include S508 conformance assessment results or a timeline for completing the assessment and providing results.

(2) Approval authority for the undue burden exception resides with the Director, in coordination with the Office of the General Counsel, and the exception must be clearly demonstrable in court if challenged legally. Approval authority for the other exceptions resides with the Chief Information Officer, who may delegate it to the S508 PM. The approving authority will reevaluate exceptions annually. As appropriate, the contract file must include a copy of each exception approval.

b. Undue Burden.

Applies in the rare instances when conformance would impose a substantial difficulty or expense to the Agency at-large, not just an individual organization, and considering the availability of Agency resources. A finding that an undue burden exists does not absolve DTRA of the requirement to provide comparable access to individuals with disabilities. The determination must document why and to what extent compliance with each provision in these standards creates an undue burden.

c. National Security System (NSS).

Applies to ICT operated as part of an NSS, as defined in Section 11103(a) of Title 40, United States Code. The NSS exception does not extend to Information Technology systems solely with a NSS designation of “Processes Classified Information” or “Commercial-off-the-Shelf (COTS) products.” NSS exceptions are not automatic, as certain DoD NSSs may still be required to meet accessibility standards if administrative in nature or otherwise determined by the Chief Information Officer or Agency S508 policy. NSSs should be made accessible whenever feasible, and all S508 NSS exceptions must demonstrate a judicious decision process IAW the February 4, 2021 National Security Memorandum.

d. Best Meets.

Applies to COTS products. When ICT that fully conforms to S508 digital accessibility standards is not commercially available, procure ICT that conforms best with the standards, consistent with meeting DTRA’s business and mission needs.

e. Fundamental Alteration.

Applies only when conformance to the S508 digital accessibility standards would alter the inherent design of the ICT to the extent that it no longer adequately meets the Agency's mission or business need. Requests for exception for the entire ICT require a determination that all the features and functions of the ICT cannot conform to S508 digital accessibility standards without fundamentally altering the nature of the ICT. If only some features and functions cannot conform without fundamentally altering the nature of the ICT, only those features and functions may be requested for exemption.

f. ICT Incidental to a Contract.

Applies to ICT acquired by a contractor incidental to a contract, but does not apply if:

- (1) The ICT will revert to government ownership.
- (2) The USG directly procures the ICT.
- (3) Members of the public or government employees use the ICT.

g. ICT Located in Maintenance or Monitoring Spaces.

Applies to status indicators and operable parts (i.e., physical controls) for ICT functions located in spaces that only service personnel access for maintenance, repair, or occasional equipment monitoring. This exception does not extend to COTS products.

h. Self-Contained Closed Products.

Applies to self-contained closed products that have embedded software to which a user cannot easily attach or install AT. Examples of self-contained, closed products include printers, calculators, fax machines, copier machines, and information kiosks.

APPENDIX: ICT PRODUCT TYPES SUBJECT TO S508

The ICT product types listed in this appendix are subject to S508 unless they impose an undue burden on the Agency (see Paragraph 3.1.b.). For specific standards, refer to Part 1194 of Title 36, Code of Federal Regulations (CFR).

a. Software Applications and Operating Systems.

Software applications and operating systems must address specific features required to meet S508 standards. It is impossible to give specific coding techniques because there are many programming languages for a software producer to select from,. If a programming language lacks the necessary features to fulfill S508 requirements, consider using another language.

b. Web-Based Intranet and Internet Information and Applications.

(1) DTRA's policy is to make its websites, web pages, documents, and information equally accessible to all. This also applies to web-based interfaces to other ICT products or systems. Web-based applications apply to any aspect of a web page the user must interact with to operate a given function. For example, a streaming audio player delivers the content of a page to the user and, therefore, must be accessible to the user. Since content is dynamic, DTRA's websites must undergo continuous review and redesign, if necessary, for S508 compliance.

(2) All content owners and developers are responsible for confirming digital accessibility of websites and webpages meet S508 standards, IAW the Office of Management and Budget Memorandum M-23-22. The S508 PM validates that Agency web pages are S508 compliant and accessible to employees who use AT either DTRA-wide or on an individual basis.

c. Telecommunications Products.

Section 255 of Public Law 104-104 (also known as the "Telecommunications Act of 1996") requires phone manufacturers and telecommunications service providers to make their products accessible when feasible to do so. A video phone, for example, is customer premises equipment subject to Section 255 provisions. These devices include wires, analog and digital wireless, internet-based products, in-house electronic exchangers, and telephone answering machines and systems.

d. Video and Multimedia Products.

Video and Multimedia products include audio and visual equipment (legacy analog and digital systems, personal computers, desktops, notebooks, handhelds, etc.), as well as the content itself (video and DVD programs, narrated slide productions, computer-generated presentations, etc.).

e. Self-Contained Closed Products.

These products have embedded software to which a user cannot easily attach or install AT. For example, one could attach a screen reader to a computer which meets the S508 standards, but one would not attach a screen reader to a copier machine. A copier machine is an example of a self-contained, closed product. Other examples include printers, calculators, fax machines, information transaction machines, and information kiosks. This requires self-contained, closed products to contain built-in digital accessibility. A headset is an allowable add-on since it is not AT in this case. Use of headsets might be for privacy rather than digital accessibility reasons.

f. Desktop and Portable Computers.

Desktop and portable computers include personal computers such as desktops, notebooks, laptops, and displays. S508 requirements also apply to handheld devices, workstations, and servers.

g. Networking Equipment.

Networking equipment includes routers, switches, firewalls, multiplexers, and other hardware that requires a user interface. A router, for example, utilizes software for configuration, monitoring, and management.

GLOSSARY

G.1. ACRONYMS.

TERM	DEFINITION
ACR AT	Accessibility Conformance Report assistive technology
CFR COTS	Code of Federal Regulations commercial-off-the-shelf
DITPR DTRA	DoD Information Technology Portfolio Repository Defense Threat Reduction Agency
FAR	Federal Acquisition Regulation
GSA	General Services Administration
IAW ICT	in accordance with information and communications technology
LMS	Learning Management System
NSS	National Security System
PM	program manager
S508	Section 508
USG	United States Government
VPAT	Voluntary Product Accessibility Template
WCAG	Web Content Accessibility Guidelines

G.2. DEFINITIONS.

TERM	DEFINITION
accessible	Conforming to the provisions of the IICT Accessibility Standards, published by the U.S. Access Board.
AT	Any item, piece of equipment, or system, whether acquired commercially, modified, or customized, that increases, maintains, or improves functional capabilities of individuals with disabilities.
GSA	The General Services Administration is an independent agency of the USG established in 1949 to help manage and support the basic functioning of federal agencies, and is responsible for USG S508 program management.
ICT	<p>Any equipment or interconnected system or subsystem of equipment that is used in: the creation, conversion, or duplication of data or information; or the automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, reception, or broadcast of data or information.</p> <p>ICT includes, but is not limited to electronic content, including e-mail; electronic documents; Internet and Intranet websites; telecommunications products, including video communication terminals; computers and ancillary equipment, including external hard drives; software, including operating systems and applications; information kiosks and transaction machines; videos; Information Technology services; and multifunction office machines that copy, scan, and fax documents. For specific standards, refer to Part 1194 of Title 36, CFR, W3C Web Content Accessibility Guidelines (WCAG) 2.0 and 2.1, and DoD Manual 8400.01.</p>
market research	The process of collecting and analyzing information about the market's capability to satisfy a specified need.
NSS	<p>A telecommunications or information system operated by the Federal Government. The NSS's function, operation, or use:</p> <ul style="list-style-type: none">(A) Involves intelligence activities.(B) Involves cryptologic activities related to national security.(C) Involves command and control of military forces.

TERM

DEFINITION

(D) Involves equipment that is an integral part of a weapon or weapons system.

(E) Is critical to the direct fulfillment of military or intelligence missions IAW Section 3.1.c.

undue burden

A significant difficulty or expense. In determining whether an action would result in an undue burden, an agency must consider all agency resources available to the program or component for which the product is being developed, procured, maintained, or used.

U.S. Access Board

An independent Federal agency (full title: Architectural and Transportation Barriers Compliance Board) charged with developing technical and functional standards to establish a minimum level of digital accessibility for individuals with disabilities.

The Board develops and maintains design criteria for ICT and provides technical assistance and training on these requirements and on accessible design.

The Board's ICT digital accessibility standards are set forth in: DoD Manual 8400.01; Part 1194 of Title 36, CFR; and Subparts 39.2, 39.203(c)(2), and 10.001 of Subchapters B and F, Volume 1 of the FAR. These standards have been incorporated into the FAR and are located at: <https://www.access-board.gov>. The Board also enforces physical accessibility standards that cover federally funded facilities.

REFERENCES

- Code of Federal Regulations, Title 36, Part 1194
- DoD Chief Information Officer Memorandum, “Section 508 Standards Conformance Reporting for DoD Information Systems,” October 31, 2023
- DoD Chief Information Officer Memorandum, “Designation of Component Digital Accessibility/Section 508 Program Manager,” February 29, 2024
- DoD Instruction 5000.82, “Requirements for the Acquisition of Digital Capabilities,” June 1, 2023
- DoD Manual 8400.01, “Accessibility of Information and Communications Technology (ICT),” November 14, 2017
- Federal Acquisition Regulation, Volume 1, Subparts 39.2, 39.203(c)(2), and 10.001 of Subchapters B and F
- National Security Memorandum, “Revitalizing America’s Foreign Policy and National Security Workforce, Institutions, and Partnerships,” February 4, 2021
- Office of Management and Budget Memorandum M-23-22, “Delivering a Digital-First Experience,” September 22, 2023
- Public Law 104-104, Section 255, “The Telecommunications Act of 1996,” February 8, 1996
- United States Code, Title 29, Section 794d (also known as “Section 508 of The Rehabilitation Act,” as amended)
- United States Code, Title 40, Section 11103(a) (also known as the “Applicability to National Security Systems,” as amended)
- W3C Web Content Accessibility Guidelines (WCAG) 2.0, December 11, 2008
- W3C Web Content Accessibility Guidelines (WCAG) 2.1, June 5, 2018