

Section 508 Frequently Asked Questions

Search Engine Optimization: Frequently Asked Questions, FAQs Archive

Color

Why should color not be used to convey information?

Color should not be used to convey unique information because individuals who may be color blind may not be able to distinguish the color conveying the information.

What is wrong with red text?

Same problem as above except that red text looks like grey text. As an example, **Red text looks** looks like Gray text and is hard to view. This is why if you use red text then make it bold.

Documents

If documents are posted on the web, do they have to be compliant?

The simple answer is yes. This includes Sharepoint, Diplopedia, HTML, public or team sites, irregardless of audience. Section 508 of the Rehabilitation indicates that any electronic information that the government develops, procures, maintains, or uses shall be made accessible to individuals with disabilities. To learn how to make electronic documents accessible, there are tips and common questions answered below. More information can be found under the Roundtables and Awareness Events of the IMPACT website, or specific questions can be sent to the IMPACT office at Section508@state.gov.

Documents: Microsoft Excel

General

- Place column headings at the spreadsheet top and row headings at the far left.
- Do not intersperse blank columns.
- Do not use different columns to offset totals, subtotals and line items.
- Title spreadsheets.

Documents: Microsoft PowerPoint

How can I add alternative text to images in a PowerPoint document?

Select the image to add alternative text to. In PowerPoint 2007, Choose the Format menu (Alt + J), then Size (Alt + SZ), the Alt Text tab, and enter the alternative text into the provided window.

Other ways to help make PowerPoint accessible Use templates, alternative text for images, group objects then add alternative text. PowerPoint is difficult to navigate, adding a textbox is like adding an object.

Documents: Microsoft Word

How can I add alternative text to images in a Word document?

Select the image to add alternative text to. In Word 2007, Choose the Format menu (Alt + J), then Size (Alt + SZ), the Alt Text tab, and enter the alternative text into the provided window.

Why should I use the Table wizard in Word?

Tables that are drawn do not enable screen readers to associate available headers with the data the table contains.

How can I make a table accessible within a Word document?

Use the table wizard. Do not draw the table. Create a caption, but keep it simple.

Why can't I use a tab delimited table in Word documents?

A tab delimited table is rendered as lines of text and does not provide a relationship between the data and the headers. The title cannot be associated with the table as it is converted to lines of text as well.

I work with a lot of Word documents that may be converted to another format later. What can I do to make the subsequent documents compliant?

Sometimes, accessibility features that are added in Word, can translate to the documents that may be converted to other formats at a later time. Add good alternative text to all images. Create all tables with the Table Wizard. When graphics are created using shapes or multiple images, they are grouped and treated as any other images, associated with good alternative text. Use stylesheets as these can help people navigate other document formats. Avoid using color to depict unique information. While these steps may make the other document formats more accessible, they will need to be reviewed to ensure the accessibility features translated into the new format.

Forms

Frames

What is the purpose of the Title attribute?

- The Title attribute is used to provide descriptive text for a frame.

Then what is the purpose of the Name attribute?

The name attribute can be use as a target reference.

The EIT Web Accessibility Standards indicate that I only need to use the Title attribute. Why do I need anything else?

That is true, but you still need to use proper coding techniques. Be aware screen readers will read the Name attribute first.

A software tool corrected my Frame code. It left out the Name attribute and replaced it with the Title attribute. Now, my screen reader is reading the src= information.

The reason is that the screen reader will default to read the Name attribute first. If the Name attribute is missing it will read the 'src= ' information. Add the Name attribute to your code and you will see that everything is correct.

Do I need a skip link for frames?

No, a user with assistive technology will be able to navigate frames and by-pass any repetitive links. The paragraph 1194.22(o) call for a "method" and frames are a method to skip repetitive links.

General

What is Section 508?

Enforcement of Section 508 of the Rehabilitation Act of 1973 began on June 21, 2001. It requires when Federal agencies develop, procure, maintain or use electronic and information technology (EIT), it takes into account the needs of all end users, including people with disabilities. Doing so enhances the ability of Federal employees with disabilities and the public to have access to and use of information and data that is comparable to that provided to others. EIT is information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion or duplication of data or information. EIT includes telecommunication products, such as telephones, information kiosks, transaction machines, World Wide Web sites, multimedia (including videotapes) and office equipment, such as copiers and fax machines.

What should State Department employees, supervisors, managers or webmasters do to ensure that web pages are Section 508 compliant?

State managers and employees should review the Section 508 Website Accessibility Guidelines, Website Accessibility Checklist, and Frequently Asked Questions (FAQs) located at the IMPACT website:

Does IMPACT certify a site is compliant?

No one can certify that a site is compliant. The reason is that the EIT Accessibility Standards are open to as how to implement the different sections of the standards, especially web pages. We will say that we don't find any issues based on our interpretation of the EIT Accessibility Standards.

We made our own compliancy logo for our web pages does this present a problem?

Yes, my first question is are you a making yourself a certifying body for other regions or agencies? My second question is that if a site is not compliant based on a different interpretation of the EIT Accessibility Standards then will you assume the liability for anyone that uses your logo. The best thing to do is once you feel that your site is compliant let others check it and then don't add anything else to your site.

What about other tools?

Other tools have the same issues but in different ways. There is nothing wrong with using the free tools but know their limitations, know the E&IT Accessibility Standards, and know the State Department's Section 508 Guidelines.

Why don't you have the HTML Validator as part of your tool list?

The HTML Validator checks your HTML code to verify that it is in compliance with the HTML 4.01 coding standards. It does not verify Section 508 compliance or web accessibility. If you are not using HTML 4.01 coding standards as part of your design guide, then you will get multiple errors even though your pages are Section 508 compliant.

Do I need a sign interpreter for my meetings?

If it a small meeting and you know that your audience will not have anyone that has a disability then the answer would probably be 'No'. But, if you are doing a presentation then the information will have to be assessible and able to convey the information of the meeting. If it is a large meeting then a sign interpreter should be available.

Do I need to retrofit my web pages that were created before June 21, 2001?

Pre-existing electronic and information that was procured before June 21, 20001 does not have to be retrofitted. There is no grandfather clause. This statement is found in the legislation itself under section F, Enforcement.

This is a congressional not an Access Board ruling. But, the agency has the right to go beyond and require electronic and information be retro-fitted to be compliant with the spirit and intent of Section 508.

How will Section 508 be enforced?

If a member of the public or a Federal employee determines that EIT is not accessible, they may file an administrative complaint alleging that the State Department has not complied with the accessible technology standards. The complaint process is the same as that used for Section 504 of the Rehabilitation Act, for complaints alleging discrimination on the basis of disability in Federal programs or activities. It provides injunctive relief and attorney's fees to the prevailing party, but does not include compensatory or punitive damages.

IT CCB: GPATs

What does GPAT mean?

GPAT stands for Government Product Accessibility Template.

When do I need a GPAT? Any time an in-house product is developed or a COTS product is modified.

What information is necessary to include in a GPAT?

Program Manager information

Who can fill out a GPAT?

Government

Which sections of a GPAT need to be filled out?

Summary Table, Detailed Table, Contact Information.

IT CCB: VPATs

What does VPAT mean?

VPAT stands for Voluntary Product Accessibility Template.

When do I need a VPAT?

What information is necessary to include in a VPAT?

Vendor information Who can fill out a VPAT?

Vendor, not government

Which sections of a VPAT need to be filled out?

summary table, detailed table, contact info

IMPACTs Role

JavaScript

What are the JavaScript issues for Section 508?

Image rollovers – Scripts that are used to change an image's state when a user moves a mouse over it are an accessibility problem if: Text or other meaningful information is conveyed in the mouseover image (e.g., the normal state is a blank button, but on mouseover the button shows a title for the item or a recognizable logo); The item changes other content on the page (e.g., mousing over an area on the page causes text or other content to appear in another area, when that content is otherwise invisible). This is an issue for users who are blind or use a keyboard or switch device exclusively. Interface Adjustments – can be ok, but needs verification Form Validation – ok if server-side error reporting is provided Form Submission – If the form uses an anchor and JavaScript to submit a form (e.g., ``), people with JavaScript turned off won't be able to submit the form. Dynamic HTML – often problem, really needs human judgement Redirect/Refresh Page – problem (accessible alternatives exist) Create popup window and change current window – Popup windows (``) and window focus changes (``) confuse users of screen readers by changing the focus on their windows without permission. Generate Content – problem

Is it possible to use JavaScript to auto-fill a form?

It is possible to auto-fill forms using JavaScript and the screenreader will read the data in the auto-fill forms. This has been tested only with JAWS and when using an auto-fill JavaScript function it should be checked. Here is the example:

```
<html>
<head>
<title>Untitled Document</title>
<meta http-equiv="Content-Type" content="text/html; charset=iso-8859-1">
<script language="JavaScript">
function fillAddress()
{
if (document.fillForm.sameInfo.checked)
{
<nowiki>document.fillForm.Address2.value = document.fillForm.Address1.value; }</nowiki> else {
document.fillForm.Address2.value = "; } } </script>
</head>
<body>
<form name="fillForm" action="" method="post">
<label for="txtAddress1">Address: </label> <input type="text" name="Address1"
id="txtAddress1">
<br>
<br>

<input type="checkbox" onClick="fillAddress()" name="sameInfo" id="txtchkbox"><label
for="txtChkbox">Click to make same address</label><br>
<br>
<label for="txtAddress2">Same Address: </label><input type="text" name="Address2"
id="txtAddress2">
</form>
```

```
</body>
</html>
```

Navigation & Design

What is the skip navigation link?

The skip navigation link is a link that's usually located at the top of the page or after the logo that goes to the main content of the page. This allows the users, of assistive technology devices, to either jump pass repetitive links (i.e., navigational links) to the main content of the page or to go through the navigational links.

How do you implement a skip navigation link?

There are a few ways to implement a skip navigation link. If you want the skip navigation link to be invisible to sighted users (not recommended), code a 1 pixel transparent GIF as follows:

Origin:

```
<a href="#content"></a>
```

Destination:

```
<a name="content"></a>
```

For a visible skip navigation link (recommended), code the following:

Origin:

```
<a href="#content">Skip Navigation</a>
```

Destination:

```
<a name="content"></a>
```

Can I use any other wording for skip navigation links?

Yes, as long as the purpose of the link is clear. The most common phrases used are: Skip Navigation Skip to Content Jump to Main Content

Why shouldn't "click here" be used?

When an assistive technology device makes a link list of the page, it will make a list of every link on the page. If you have multiple "click here", "more", or something similar, the list will read to the user:

```
logo skip to main content click here click here
```

As a result the user cannot determine which "click here" goes where and it doesn't provide meaningful information.

I have text only pages for my web site, do I need to make my non-text only page compliant?

Yes, you do. The Access Board EIT Web Accessibility Standards, 1194.22(k) states the following:

Paragraph (k) requires that a text-only web page shall only be provided as a last resort method for bringing a web site into compliance with the other requirements in §1194.22. Text-only pages must contain equivalent information or functionality as the primary pages. Also, the text-only page shall be updated whenever the primary page changes. This provision is meant to be consistent with WCAG 1.0 Checkpoint 11.4 which provides that "if, after best efforts, you cannot create an accessible page, provide a link to an alternative page that uses W3C technologies, is accessible, has equivalent information (or functionality), and is updated as often as the inaccessible (original) page."

Non-Text Elements

Do I need descriptive text for bullet GIFs?

If the GIF does not convey information, you do not have to put in descriptive text but you do need to have an ALT attribute. The syntax for this type of use of the ALT attribute: alt=" ".

Is it correct to use the following for descriptive text: alt="balloon.gif (112 bytes)"?

No, this does not convey a description of the image. Instead of using the file name, give a description of the image's visual information as if you were describing it to someone on the phone. This description should be placed in the ALT attribute.

How much descriptive text is enough?

This is a judgement call but you want the text information to convey the image to the user. There is tendency to overcompensate just as there is a tendency to supply very little information.

If I have an image and a text description next to the image is that adequate?

No, you will need to supply some descriptive text in the ALT attribute. You cannot do alt=" ", this does not provide descriptive text to the image. The descriptive text does not have to be as detailed as the information you supplied on the page.

Can I use an animated GIF?

Yes, just provide descriptive information as to the action of the GIF.

I have an image with an embedded link and alt="link to the IMPACT home". Screen readers read "link link to the IMPACT home". How can I remove the extra link?

Screen readers need to notify the user that it is on a hyperlink and it does this by saying "link". The screen reader will read the ALT attribute, that is why you are hearing "link link to the IMPACT home". Just remove the "link to" and you will eliminate the extra "link". Also, this applies to "graphic of" or "image of" for images.

Screen Readers

What is a screen reader?

A screen reader is software that interprets electronic information and transforms it to speech.

Can Screen Readers be used to test for Section 508 Compliance?

Yes. Screen readers, like JAWS, can be useful tools to help determine Section 508 compliance. However, even if a user is able to access a site or application with a screen reader, it does not certify that the site or application is compliant. Testing with a screen reader may help developers find potential compliance issues such as, whether or not the site/application can be navigated with a keyboard, whether or not images have alternative text, and whether or not ways to skip navigation are provided, as a few examples.

How can I find out more about specific screen readers?

There is more information regarding specific screen readers within the IMPACT Frequently Asked Questions.

Screen Readers: JAWS

What is JAWS?

Windows Product, developed by Freedom Scientific, that works with Microsoft Active Accessibility (MSAA) Designed to Work With Microsoft Products, Especially Internet Explorer

How does JAWS Work?

Captures Video Output of the Computer Reformats the Screen Reads the Information Synthesizes Information to the User as Speech

Can Screen Readers be used to test for Section 508 Compliance?

Yes. Screen readers, like JAWS, can be useful tools to help determine Section 508 compliance. However, even if a user is able to access a site or application with a screen reader, it does not certify that the site or application is compliant. Testing with a screen reader may help developers find potential compliance issues such as, whether or not the site/application can be navigated with a keyboard, whether or not images have alternative text, and whether or not ways to skip navigation are provided, as a few examples.

How do I navigate HTML pages using JAWS?

Some of the key commands that may help a new JAWS user navigate HTML pages with a screen reader are:

Description Key : Combination

Read the Page: INSERT + DOWN ARROW

Increase Voice: Rate PAGE UP

Pause Reading: CTRL

Decrease Voice Rate: PAGE DOWN

View Links List: INSERT + F7

Go Forward a Page: ALT + RIGHT ARROW

Go Back a Page: ALT + LEFT ARROW

List Headings: INSERT + F6

Move to First Form Field: INSERT + CTRL + HOME

Move to Next Form Field: F

Enter Forms Mode: ENTER

Exit Forms Mode: NUM PAD PLUS

List Form Fields: INSERT + F5

Move to Next Table: T

List Tables: CTRL + INSERT + T

Move To and Read Next Cell; CTRL + ALT + RIGHT ARROW

Move To and Read Previous Cell; CTRL + ALT + LEFT ARROW

Move To and Read Cell Above: CTRL + ALT + UP ARROW

Move To and Read Cell Below: CTRL + ALT + DOWN ARROW

Next Frame: M

Prior Frame: SHIFT + M

List Frames: INSERT + F9

Move to Next: List L

Move to Previous List: SHIFT + L

Graphic Description: G

Paragraph: P

How do I navigate PDF files using JAWS?

Some of the key commands that may help a new JAWS user navigate PDF pages with a screen reader are*:

Description Key: Combination

Go To First Page: CTRL + SHIFT + PAGE UP

Go To Last Page: CTRL + SHIFT + PAGE DOWN

Go To Page: CTRL + SHIFT + n (where n is the desired page number)

Next Page: CTRL + PAGE DOWN
 Previous Page: CTRL + PAGE UP
 Forms Mode: ENTER
 Virtual Find: CTRL + INSERT + F
 Links List: INSERT F7
 Say All: INSERT + DOWN ARROW

Note: Many HTML keystrokes can be used to navigate PDFs.

Self-Contained, Closed Products

Are hand held devices (palm tops, cell phones) covered by Section 508?

Yes. This technology is "electronic and information technology" covered by Section 508 and the Access Board's standards. Most hand held devices currently fall in the category of "self contained closed products." (See Section 1194.25 of the Access Board's standards). As technology advances, hand held devices may fall into other categories as well. Agencies are required to procure such products that meet the Section 508 standards, subject to applicable exceptions such as fundamental alteration (Section 1194.3(e)), commercial availability (Section 1194.2(b)), and undue burden (Section 1194.2(a)).

Why do I have to provide alternative access for Touch Screens?

A person who has lost a limb, such as an arm or hand, will use a prosthetic device such as an artificial hand. They may well have sufficient control to be able to accurately point at and press buttons or keys. However, the prosthesis may be made of metal, plastic, or some other material with dielectric properties that are different from those of a human finger. The terminal will therefore have to be able to detect this other material in order to react to the user's inputs.

Is there a quick reference guide for making a Kiosk accessible?

Here is table to consider for making a Kiosk accessible. The Section 508 Accessibility Standards 1194.25 is the final test.

Kiosk Quick-reference Table*

What can't I do with the device?	Why can't I do it?	Solutions
Can't see the device well	Low vision	Use voice output, or Change the display settings, and/or Allow speech input
Can't locate buttons on the device (can't see where they are)	Low vision, Blindness	Use a list mode, requiring only 3 commands, or Enable users to confirm their selections
Can't read the device well	Dyslexic, Poor cognitive abilities	Use voice output, or Change the display settings
Can't read the device at all	Unfamiliar language, Poor cognitive abilities	Use voice output, or Use voice output
Can't hear the device well	Hard-of-hearing, Deaf	Show sounds visually , or Change the sound settings, or Use assistive listening systems
Can't hear the device at all	In a noisy environment, Tinnitus, Deaf	Show sounds visually
Can't hear the device well and Can't see the	Left glasses at home and hearing aid batteries just ran out,	Use voice output and change the sound settings, or Enlarge text on the display and change

device well	Deaf-blind	the sounds settings, or Change the sounds settings and change the display settings, or Use remote control with a tactile display (e.g., Braille)
Can't reliably press only one button at a time on the device	Poor muscle control	Enable users to confirm their selections, or Use voice output
Can't touch the device / Can't reach the device	Poor reach capabilities do to limited muscle movement, wheelchair, etc.	Use remote control it, or Allow speech input
Can only use one or two buttons on the device	Muscles only allow limited movement can't move below the neck	Allow scanning input, or Allow speech input
Can't talk to the device	Unable to speak, Poor speech.	Allow an alternative to speech input
Can't understand the device	Poor cognitive abilities	Change the settings for voice output, or Change the settings for the display, or Use a simplified remote control

Information courtesy of University of Wisconsin, TRACE Center, this table has been modified from the original.

How is the "back office" exception applied?

Hardware. Two conditions must be met before an agency uses this exception when procuring a product. First, the agency must intend to locate the product in a physical space frequented only by service personnel. Second, the use of the product by the service personnel must be for maintenance, repair or occasional monitoring. If both conditions are met, the product does not have to meet the standards.

Hardware that might meet these dual conditions includes: telephone equipment placed on racks in a "closet" or small room and network routers and storage devices or servers located in rooms or areas frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment.

Software. Software which is installed or operated on a product which falls under this exception would be exempt from the standards if the software application could only be operated from the physical place where the product is located. This might include specialized diagnostic software. By contrast, if the software could be operated from a remote workstation, the software would be subject to the Access Board's standards irrespective of who is using it since the product interface is not located in a physical space which meets the criteria for this exception.

Software Applications and Operating Systems

Is there a way to make Unix or Linux accessible?

Answer: Yes, the GNOME 2.0 project has been released. Information can be found on making accessible applications at the GNOME Developers site and at SUN Microsystems GNOME Project Web site.

Do Federal agency software or web development tools have to meet the Access Board's standards?

Answer: Yes. Software applications, such as web development tools, are considered EIT and therefore covered by the Access Board's standards, unless an exception applies.

Is there a free tool for checking software applications?

Answer: Microsoft has the MicroSoftActive Accessibility (MSAA) 2.0 SDK Tools which includes the Accessible Event Watcher, Accessible Explorer, and Inspect Objects.

Is there a free tool for checking software applications?

Answer: Microsoft has the MicroSoftActive Accessibility (MSAA) 2.0 SDK Tools which includes the Accessible Event Watcher, Accessible Explorer, and Inspect Objects. The files can be downloaded from:

<http://www.microsoft.com/downloads/details.aspx?displaylang=en&FamilyID=3755582A-A707-460A-BF21-1373316E13F0>.

Is there a testing procedure for Software Applications?

Answer: Yes, the Software Section of the IMPACT website has a Software Test Procedures for Section 508

Is there a general guide for setting the control properties in .NET?

Answer:

Use colors from the System tab of the color picker.

Use accelerators for all menus, labels, buttons, and so on.

Set control properties as described in the following table.

Control Property Settings

Property	Setting
Accessible Description	A description of the control.
Accessible Name	A name for the control.
Accessible Role	Default, or reset this property if a control has another role.
Tab Index	Set in a logical order.
Text	All clickable controls should have a keyboard access key (shortcut).
Font size	Default or set to 10 points or larger
Forecolor	Default
Backcolor	Default
Background Image	Default

Tables: HTML

Video and Multimedia

Do I need captioning if my targeted audience does not need captioning?

Yes, the E&IT Accessibility Standards state "...Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation...". At present this method is captioning.

Do I need to retrofit my existing videos?

No, but you must provide reasonable accommodation upon request. If you have videos that are popular you may want to consider adding captioning.

If I conduct training and use multimedia, such as videotapes or computer based training, must the materials developed be accessible under 508?

Yes. Multimedia is considered E&IT and, if used by the Federal government, must be accessible unless an exception applies. Section 1194.22 of the Access Board's standards addresses requirements for web-based intranet and Internet information and applications. Section 1194.24 addresses video and multimedia products. In addition to the requirements of Section 508, agencies also have obligations to their employees under Sections 501 and 504 of the Rehabilitation Act. --- FAQ from Section508.gov ---

If a Federal agency is distributing a television or multimedia production or a web-cast presentation, does it have to be open or closed captioned and audio-described?

Section 1194.24(c) and (d) of the Access Board's standards require that all training or informational video and multimedia productions which support the agency's mission and which have audio information or visual information that is necessary for the comprehension of the content, be captioned or audio described. Hence, if the production is multimedia (e.g. image and sound) and is considered "training or informational," then it must meet the applicable requirements of 1194.24 (c) and (d) of the Access Board's standards. If the production is web-based, regardless of whether it is multimedia, such as a live webcast of a speech, then it must also meet the applicable requirements of 1194.22. --- FAQ from [Section508.gov](#) ---

Does the requirement to open or close caption and audio describe apply to productions that have a limited purpose, scope, and shelf life or contain quickly

Section 1194.22 of the Access Board standards applies requirements to web-based intranet and internet information and applications without regard to the perishable nature of a production. Similarly, Section 1194.24 addresses video and multimedia products without regard to the shelf life of a production. --- FAQ from [Section508.gov](#) ---

Do videotapes of briefings or "raw or stock" film footage for documentation purposes have to be captioned or audio described? What if the videotape is later played for an audience? Do graphs and charts used in the briefing have to be audio described?

Briefings or other recordings made for purposes of documentation are not considered "training or informational videos." As noted in the preamble to the Access Board's final rule, section 1194.24 does not require that a videotape recorded by a field investigator to document a safety violation be captioned or audio described. However, if such a videotape were subsequently used as part of a training or informational presentation, it would have to be captioned and audio described. (See 65 Federal Register 80517, December 21, 2000.) Any graphs or charts that are not described in the narration of the video would have to be audio described if the visual information was necessary for the comprehension of the content. --- FAQ from [Section508.gov](#) ---

Is the requirement to open or close caption, and to provide audio description specific to English?

No. The requirement to caption (i.e., to provide access to audio information for persons with hearing impairments) and provide audio description applies irrespective of the language. It is recommended that captioning and audio description be in the same language as the content of the production. For example, Spanish audio should be captioned in Spanish. There is no requirement to provide captioning in a language different from the content of the production (e.g., English audio need not be in Spanish or vice versa.) --- FAQ from [Section508.gov](#) ---

Must the lyrics in songs embedded in productions be open or closed captioned?

This answer depends on whether the lyrics are considered content essential for comprehension. For instance, a production that features a dialogue between two people while a radio softly plays a song in the background should have the conversation in the foreground captioned. However, since the song from the radio is not essential for comprehension, the captions could simply indicate that music is playing in the background. -- FAQ from [Section508.gov](#) ---

If an agency has a system in place for broadcasting streaming video, is it required to replace it with a system that meets the standards when the next lifecycle upgrade occurs?

Yes. Section 508 applies to any procurement of E&IT made after June 21, 2001. In addition to producing compliant video and multimedia products, the replacement E&IT should also conform to the other applicable sections of the standard such as software and self-contained products.

Does presentation equipment procured have to meet the Access Board standards?

Yes. Presentation equipment, such as LCD data projectors and laptop computers, are considered EIT and therefore covered by the Access Board's standards, unless an exception applies. If the equipment was procured after June 21, 2001, and an exception does not apply, the action would be enforceable under Section 508(f). See sections G and H for more details.

If an instructor uses slides from presentation software, such as Microsoft PowerPoint or Corel Presentations, which are projected to a live class, do the Access Board standards apply?

Generally, no. However, if the slides contain embedded multimedia elements, such as videos, then the Access Board standards apply to this live presentation. As a reminder, the software used to create and playback the slideshow must meet the requirements of Section 1194.21, software applications and operating systems. Similarly, the projection equipment including the presenter's remote must meet the requirements of Section 1194.25, self contained, closed products.

Regardless of whether the Access Board standards apply, agencies still have obligations to their employees under Sections 501 and 504 of the Rehabilitation Act. As an example of reasonable accommodation, an instructor may have to read the contents of the slides, or audio describe visual elements of the slides to class members with visual disabilities.

We are having trouble including open/closed captioning to our videos (do not have the technical means). Does providing a transcript alternative qualify as being 508 compliant? Any other solutions?

The use of transcripts as a substitute for open/close captioning is not allowed. The standard is very clear in this area:

1194.24(c) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain speech or other audio information necessary for the comprehension of the content, shall be open or closed captioned. 1194.22(d) All training and informational video and multimedia productions that support the agency's mission, regardless of format, that contain visual information necessary for the comprehension of the content, shall be audio described.

How do I ensure that I meet the provisions 1194.24(b)?

Televisions have complied with this requirement since 1993 under the Television Decoder Circuitry Act of 1993.

What is the difference between ADA Title II, Section 504 and Section 508 in regards to Video tape for training?

Shown below is an excerpt from a comment (February 7, 2002) by Doug Wakefield, Access Board, on the University of Wisconsin Trace List Server.

". . . I'd like to add a small clarification between 508 and other access requirements. Please note that Title II allows an entity to use a wide range of solutions when someone has an access problem. 508 is not quite so liberal. Under 504 of the Rehab Act, and title II of ADA, if a training involves a video tape, the provider of the

training could accommodate a deaf individual by providing a sign language interpreter, a transcript, or captioning.

508 requires the tape to be captioned and the captioning must be done even if an agency has no deaf employees.

As far as websites are concerned, under ADA and 504 a phone number can be provided as an accommodation for someone who can't access the site, under 508, the site itself must be fixed.

Doug Wakefield Accessibility Specialist. The U.S. Access Board . . ."

Please note that this refers to video tapes after June 21, 2001.