

VA Office of Inspector General

OFFICE OF AUDITS AND EVALUATIONS



Department of Veterans Affairs

*Review of
Alleged Noncompliance
With Section 508
of the Rehabilitation Act
on MyCareer@VA Web Site*

April 7, 2016
15-02781-153

ACRONYMS

AMP	Accessibility Module Platform
EIT	Electronic and Information Technology
HR&A	Office of Human Resources and Administration
OIG	Office of Inspector General
VA	Department of Veterans Affairs
VALU	VA Learning University

To Report Suspected Wrongdoing in VA Programs and Operations:

Telephone: 1-800-488-8244

E-Mail: vaoighotline@va.gov

(Hotline Information: <http://www.va.gov/oig/hotline>)



Highlights: Review of Alleged Noncompliance With Section 508 of the Rehabilitation Act on VA's *MyCareer@VA* Web Site

Why We Did This Review

In February 2015, the Office of Inspector General received a complaint alleging VA launched an enhanced version of its *MyCareer@VA* Web site even though it was not compliant with Section 508 of the Rehabilitation Act of 1973. The complainant alleged that known shortcomings of the Web site resulted in hundreds of documented instances of noncompliance with Section 508, potentially affecting the ability of individuals with disabilities to interact with key areas of the Web site.

What We Found

We substantiated the allegation. We found that VA Learning University (VALU) project officials did not address nearly 200 known Section 508 compliance issues and did not seek certification of compliance prior to the deployment of the Web site; therefore, they failed to ensure individuals with disabilities had access to information and data on the *MyCareer@VA* Web site comparable to those who do not have disabilities, as required by law.

Despite no evidence to show testing was complete or a certification of compliance, VALU certified acceptance of all deliverables and deployed the Web site in November 2014. We also determined VALU added work, at a cost of \$34,011, to the follow-on contract with a current contractor to remedy the outstanding Section 508 noncompliance issues.

The deployment of the Web site prior to the determination of Section 508 compliance occurred because VA policy is not specific regarding electronic information and technology (EIT) compliance with

Section 508 requirements. In addition, we found that VALU management did not provide adequate oversight of the project.

What We Recommended

We recommended the Assistant Secretary for Human Resources and Administration (HR&A) complete testing of the *MyCareer@VA* Web site, address outstanding issues, and seek certification for compliance with Section 508 requirements. We also recommended the Assistant Secretary for HR&A take steps to improve controls over ensuring the products VALU develops are Section 508 compliant. In addition, we recommended VA strengthen its policy for ensuring EIT products are Section 508 compliant.

Agency Comments

The Assistant Secretary for HR&A and the Assistant Secretary for Information and Technology concurred with our recommendations and provided plans for corrective action. We will monitor planned actions and follow up on their implementation.

A handwritten signature in black ink that reads "Gary K. Abe".

GARY K. ABE
Acting Assistant Inspector General
for Audits and Evaluations

TABLE OF CONTENTS

Introduction.....	1
Results and Recommendations	2
Allegation VA Learning University Launched the Enhanced Version of the <i>MyCareer@VA</i> Web Site Even Though it Was Not Compliant With Section 508 of the Rehabilitation Act.....	2
Recommendations.....	8
Appendix A Background.....	10
Appendix B Potential Monetary Benefits in Accordance With Inspector General Act Amendments	11
Appendix C Management Comments – Office of Human Resources and Administration	12
Appendix D Management Comments – Office of Information and Technology	14
Appendix E OIG Contact and Staff Acknowledgments	16
Appendix F Report Distribution	17

INTRODUCTION

Objective

In February 2015, the Office of Inspector General (OIG) received an allegation that the VA Learning University (VALU) launched an enhanced version of the *MyCareer@VA* Web site even though it was not compliant with Section 508 of the Rehabilitation Act of 1973. The complainant alleged that known shortcomings resulted in hundreds of documented instances of noncompliance with Section 508 leaving VA at risk of a potential lawsuit.

MyCareer@VA

VA launched the original *MyCareer@VA* Web site, which was available to all VA employees and to the public, in October 2011. Beginning in November 2013, VALU began taking steps to enhance the Web site and deployed the enhanced version in November 2014. Along with a complete redesign of the Web site, the enhanced version features a personalized Career Hub that provided customized career guidance and support based on where individuals were in their career and where they wanted to go. It also features an expanded multimedia library that allowed an individual to browse tips on resume writing and find courses on how to develop one's career. VA described the *MyCareer@VA* Web site as one of the key efforts under the Human Resources and Administration's Human Capital Investment Plan, which was chartered to ensure that VA employees have access to information necessary to enhance their job performance, career progression, and development as multifunctional leaders.

Section 508 of the Rehabilitation Act of 1973

At the time of this report, Section 508 of the Rehabilitation Act of 1973¹ applied to all Federal agencies. This law required Federal agencies, when developing, procuring, maintaining, or using electronic information and technology (EIT)—in the form of Web pages, Web applications, software, or office equipment—to make this content accessible to people with disabilities. Through this law, Federal employees and members of the public who have disabilities would have comparable access to, and use of, information and data to the same extent as individuals who do not have disabilities, unless an undue burden would be imposed on the agency.

Other Information

- Appendix A provides pertinent background information.
- Appendix B provides a description of potential monetary benefits.
- Appendixes C and D provide management comments.

¹As amended by Title 29, United States Code, Section 794d

RESULTS AND RECOMMENDATIONS

Allegation **VA Learning University Launched the Enhanced Version of the *MyCareer@VA* Web Site Even Though it Was Not Compliant With Section 508 of the Rehabilitation Act**

Assessment We substantiated the allegation that VALU launched the enhanced Web site even though it was not compliant with Section 508. The noncompliance issues had a potential impact on individuals with disabilities because it could affect their ability to interact with key areas of the Web site.

What We Did We conducted our review from May 2015 through January 2016. To accomplish our review, we did the following:

- Conducted interviews with the VA Section 508 Program Office (VA Section 508) and VALU 508 Support Team officials
- Conducted interviews with the contractor and VALU officials responsible for the enhancement of the *MyCareer@VA* Web site
- Reviewed contract documents, reports, and other documentation related to the enhancement of the *MyCareer@VA* Web site

What We Found We substantiated the allegation that VALU launched the enhanced *MyCareer@VA* Web site even though it was not compliant with Section 508 requirements. We found that *MyCareer@VA* project officials did not address nearly 200 known issues and did not seek certification of compliance prior to the deployment of the Web site. Failure to address known issues and seek certification of compliance with Section 508 put VA at risk of deploying a Web site that did not provide comparable access to individuals with a disability. While neither the law nor VA policy specifically state when to establish compliance, or what determines compliance, with Section 508 requirements, they both stated all EIT must be accessible to all individuals.

VA Handbook 6221, *Accessible EIT*, established general guidelines to ensure that VA's EIT was accessible by VA employees and members of the public with disabilities. Each component within VA was responsible for ensuring the EIT they develop, use, maintain, or procure was accessible to all people with disabilities, including employees and members of the public. Each Administration or staff office was responsible for ensuring their EIT meets the applicable Section 508 requirements.

*Incomplete
Compliance
Testing*

One way to help ensure EIT products were accessible to all individuals is to complete testing and address any known issues prior to releasing the product. We determined VALU officials did not ensure testing for compliance with Section 508 was complete prior to the deployment of the Web site. In addition, we determined that VALU officials did not address known issues with Section 508 requirements prior to the Web site's deployment. Therefore, VALU officials did not ensure individuals with disabilities had the same access that individuals without disabilities had to the *MyCareer@VA* Web site.

*Known Issues
Not Addressed*

We found VALU 508 Support Team officials, using the Accessibility Module Platform (AMP), identified 195 issues related to noncompliance with Section 508 prior to the launch of the enhanced *MyCareer@VA* Web site. Of the total violations identified, 173 (89 percent) were categorized as either high or medium level issues. For example, the majority of the issues categorized as high related to providing valid labels for form fields. A representative with the VALU 508 Support Team explained that valid labels should be both descriptive and properly associated with the corresponding field. If the label was not properly structured, a disabled user may not be aware that the label and field are related. Failure to address these violations prior to the release of the Web site may have affected disabled individuals' ability to access and interact with certain areas of the Web site and therefore may not have provided them with comparable access.

In addition to these issues, we found VALU launched the Web site with an enhanced version of a tool called InterviewStream. This tool allows users to record themselves answering common interview questions and to then watch the recording and use scoring tools to find out what they did well and where they could use more practice. A representative with the VALU 508 Support Team reported that he had concerns about InterviewStream's compliance with Section 508, in part because it was unable to provide captioning of the interview. He reported that by July 2014 he thought it would not be possible to come up with a way to make InterviewStream compliant with Section 508 without performing a complete overhaul of the tool. Despite this constraint, VALU officials did not seek an exception from the requirements of Section 508 and launched the *MyCareer@VA* Web site.

VA Handbook 6102, *Internet and Intranet Services*, stated that VA Internet and Intranet Web sites and sites operating on behalf of VA must be designed to support the widest range of potential users and computing platforms must be compliant with Section 508.

*Noncompliance
With Contract
Requirements*

We determined the contractor tasked with enhancing *MyCareer@VA* did not fully comply with contract requirements. The contractor's statement of work included language that stated all documents and/or deliverables shall be Section 508 compliant. In order to fulfill its responsibilities, the contractor should have completed Section 508 testing, remedied all known issues, and

sought certification for compliance with Section 508 prior to deploying the Web site. Documentation provided showed known compliance issues were still open when they deployed the Web site. Absent any documentation certifying completion of testing and compliance, VALU officials should have considered whether the contractor fulfilled its contractual responsibilities. Despite no evidence to show testing was complete or of a certification of compliance, the VALU project manager certified acceptance of all deliverables and invoices submitted by the contractor that totaled about \$21 million for performance under the contract, which included a number of other requirements.

Why This Occurred

These conditions occurred for the following reasons:

- VA policy was not specific regarding EIT compliance with Section 508 requirements.
- VALU did not have a specific process to ensure its products were compliant with Section 508 requirements.
- VALU officials did not provide adequate oversight of the project to ensure the Web site was compliant with Section 508 requirements prior to its deployment.

No Specific VA Policy

VA policy lacked specificity regarding the process for ensuring EIT products are compliant with Section 508 requirements prior to their deployment. Although VA policy provided general guidance on responsibilities and suggestions for what can be done to help ensure compliance, it did not specifically state when compliance must be established, what constitutes compliance, or how to document compliance. The policy ultimately delegated responsibility for ensuring EIT products were accessible to all individuals to the component responsible for the EIT.

Lack of a specific policy gave VA components the ability to determine when and how to establish compliance with Section 508. This could have resulted in an inconsistent understanding of the requirements for ensuring compliance, thereby putting VA at risk of deploying EIT products that are not compliant with Section 508 requirements. VA needs to strengthen its policy to ensure components are consistent in meeting requirements and for ensuring compliance with Section 508. Policy should have provided an expectation of when to establish, how to document, and what specifically constitutes compliance with Section 508.

No Specific VALU Process

Absent a specific VA policy that clearly articulates the process for ensuring compliance, VALU should have a process in place that sets the expectation of when and how to accomplish testing for compliance with Section 508 requirements. When the project began, VALU did not have a formal process in place. Lack of a formal process left room for interpretation of when and how compliance should be addressed, thereby putting VA at risk of

deploying a product that does not provide comparable access to individuals with disabilities. As a result, we found there was not a clear understanding of the requirements for when and how to accomplish compliance testing.

Representatives from the VALU 508 Support Team reported compliance with Section 508 should have been established prior to the release of the Web site. These representatives also reported that in order to establish compliance the Web site needed to go through not only the VALU 508 Support Team for review, but also the E-Learning function of VA Section 508. While the VALU 508 Support Team was testing the Web site for compliance with Section 508, this testing was not complete prior to the release of the enhanced Web site. In addition, we confirmed VALU never submitted the Web site to the E-Learning function of VA Section 508 for review.

VALU managers told us that the process they were aware of at the time the project began involved self-certification. Self-certification allowed an individual to submit a document certifying that to the best of their ability, testing for compliance is complete and the product conforms to Section 508. However, this manager said no one in VALU management would sign the self-certification document because they did not consider themselves Section 508 compliance experts. In addition, this VALU manager reported the Web site did not have to be compliant to go live. He said his understanding was that you have to strive to be 508 compliant, but the law does not specifically state what is considered 100 percent compliant, and compliance is subject to interpretation.

Because there was no formal process in place at the time the enhancement began, the individuals involved with the enhancement did not have a clear understanding of when the Web site needed to be compliant or how to obtain certification of compliance. As a result, VALU deployed the Web site without obtaining certification of compliance and therefore, did not ensure it provided comparable access to disabled individuals. VALU needs to develop a process that sets forth the expectation of when and how to accomplish testing for compliance with Section 508 requirements. To ensure there is a clear understanding of the process, VALU needs to ensure individuals involved in the development and maintenance of EIT products receive training related to the process and the expectation for ensuring compliance with Section 508.

*Inadequate
Oversight*

VALU management did not provide adequate oversight of the Web site enhancement project to ensure the Web site was compliant with Section 508 requirements prior to its deployment. It is each component's responsibility to ensure the EIT they develop is accessible to all individuals; therefore, oversight by management is essential for ensuring EIT is accessible prior to its deployment. Adequate oversight should include obtaining sufficient and reliable information regarding the status of the project and its compliance with Section 508. Adequate oversight by management provides

the component with the ability to make informed decisions and recommendations related to a product's compliance with Section 508 prior to its release, thereby reducing VA's potential legal risk of deploying a product with known issues and mitigating additional costs to address known issues in the future.

We found communication from the VALU project manager to the Chief of Staff, Office of Public and Intergovernmental Affairs, on November 17, 2014, in which he stated "our 508 compliance team has confirmed that the site is 508 compliant, so it was ok to go out." Despite this communication, we found testing by the VALU 508 Support Team for compliance with Section 508 was not complete prior to the deployment of the Web site. In fact, we found the VALU 508 Support Team made a recommendation to both the contractor and the project manager on November 14, 2014, to delay the deployment of the Web site until all testing was complete. A VALU management official told us he was aware of this recommendation and that it was brought to the attention of VALU leadership. Despite the recommendation, this official said VALU leadership made the decision to deploy the Web site.

We determined that VALU management's primary source of information for the project was the project manager. A VALU management official reported that during regular project status meetings the project manager never had any significant issues to report. This official said the project manager provided verbal reports on the status of the project and he was not required to provide documentation to support the reported status. Despite these meetings, our review showed the project manager was aware of issues surrounding InterviewStream's compliance with Section 508 as early as August 2014. We found the project manager had discussions with both the contractor and the VALU 508 Support Team regarding the compliance issues; however, VALU management reportedly did not become aware of these issues until around the time the Web site was deployed in November 2014.

Given that VALU officials did not typically communicate directly with the contractor or the VALU 508 Support Team, it was critical that the information provided by the project manager be sufficient and reliable. Because VALU management did not require, nor did they receive testing reports or other documentation related to the project's compliance with Section 508, no documents related to the Web site were available for our review. As a result, we were unable to determine to what extent VALU management was involved in the planning and overall oversight of the project to ensure the Web site was compliant prior to its launch or at what point the project manager notified them of Section 508 compliance issues.

Because of inadequate oversight, we found additional work – which VALU did not consider when soliciting proposals for the follow-on contract – was required to address the outstanding Section 508 issues. We obtained a memo,

dated May 21, 2015, that detailed VA's intent to issue a modification to the follow-on contract so the current contractor could address outstanding Section 508 issues not addressed by the prior contractor. This memo stated the outstanding Section 508 issues were unknown at the time of the prior contractor's performance and the issues had only been discovered within the past several weeks. VA modified the contract on July 6, 2015, to add costs totaling \$34,011 for the remediation of all outstanding Section 508 compliance issues carried over from the prior contract. We observed VA changed the scope of other work originally planned to accommodate the additional cost so that no additional funding was required to cover the cost of remedying the Section 508 issues.

Inadequate oversight was a factor in VALU deploying the Web site even though there was no evidence to show it was compliant with Section 508. VALU leadership needed to hold management officials accountable for ensuring EIT projects are Section 508 compliant prior to release to the public. VALU management officials needed to provide adequate oversight of EIT projects, which should include requiring project managers to provide them with sufficient evidence to ensure they adhere to Section 508 compliance requirements and VA policy.

**Failure to
Ensure
Compliance
With Section
508**

We determined VALU officials did not ensure the *MyCareer@VA* Web site conformed with Section 508 requirements prior to its deployment. Failure to ensure compliance by completing Section 508 testing and addressing known issues with Section 508 requirements put VA at risk of deploying a Web site that does not provide comparable access to individuals with disabilities. Lack of comparable access may have put individuals with disabilities at a disadvantage when trying to interact with key areas of the Web site, thereby posing a legal risk to VA in that VA knowingly deployed a Web site that was not compliant with Section 508 requirements.

We also determined that VA certified and accepted contractor invoices for about \$21 million for services it considered complete, even though testing for Section 508 compliance was not complete and known issues were not fully addressed. As a result, we determined VA added work at a cost of \$34,011 to the follow-on contract to allow the current contractor to remedy the outstanding Section 508 noncompliance issues.

Conclusion

VALU management needed to take action to complete Section 508 testing, remedy all known instances of noncompliance, and seek certification of compliance with Section 508 as it relates to the *MyCareer@VA* Web site. VALU management also needed to strengthen its controls over the process for ensuring EIT products are compliant with Section 508. If VALU management did not take action, VALU was at risk of continuing to deploy EIT products that do not provide comparable access to individuals with disabilities, which could have posed a legal risk to VA and resulted in additional funds spent to address these issues.

Recommendations

1. We recommended the Assistant Secretary for Human Resources and Administration correct all Section 508 compliance issues with the *MyCareer@VA* Web site and seek certification of Section 508 compliance from the appropriate component within VA Section 508.
2. We recommended the Assistant Secretary for Human Resources and Administration develop and implement a process to ensure their products conform with Section 508 requirements prior to their deployment, which includes defining what support is required to document a product's compliance with Section 508 requirements.
3. We recommended the Assistant Secretary for Human Resources and Administration provide and require training for all individuals involved in developing and maintaining products to ensure they are aware of the requirements and expectations for conformance with Section 508 requirements.
4. We recommended the Assistant Secretary for Information and Technology strengthen policy to ensure Electronic and Information Technology products are compliant with Section 508 prior to their deployment, which includes providing an expectation of when to establish compliance, how to document compliance, and what specifically constitutes compliance with Section 508.

Management Comments and OIG Response

The Assistant Secretary for Human Resources and Administration concurred with Recommendations 1, 2, and 3 and provided plans for corrective action. We consider the planned actions for these recommendations to be acceptable. Appendix C provides the full text of the Assistant Secretary's comments.

The Assistant Secretary for Information and Technology concurred with Recommendation 4 and provided plans for corrective action. We consider the planned actions for this recommendation to be acceptable. Appendix D provides the full text of the Assistant Secretary's comments.

Data Reliability

We used computer-processed data from AMP to identify compliance issues with Section 508 as reported by VALU 508 Support Team officials. AMP is a web-based platform used by the VALU 508 Support Team and the E-Learning function of the VA Section 508 office to audit and test functionality of products for determining compliance with Section 508. We obtained an understanding of the functionality of AMP and the process by which AMP identifies and reports errors. We also compared the errors reported with other information obtained during our review. Based on our efforts, we concluded the data identified in the AMP reports were appropriate and sufficient for the review of this allegation.

**Government
Standards**

We conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

Appendix A Background

VA Section 508 Program Office

The VA Section 508 Program Office is responsible for establishing Department-wide requirements and monitoring compliance with all Section 508 laws, regulations, and guidance. VA Section 508 processes Section 508 Conformance Document submissions, and audits and validates EIT and solutions for compliance with Section 508 standards and policies. VA Section 508 is part of VA's Office of Information and Technology, and includes an E-Learning function that is responsible for testing VA's E-Learning products, such as the enhanced *MyCareer@VA* Web site, for compliance with Section 508.

VALU

VA reports VALU is the Department's corporate university that supports the agency's mission and business objectives through high quality, cost-effective continuous learning and development that enhances leadership, occupational proficiencies, and personal growth. VALU is part of VA's Office of Human Resources and Administration.

VALU 508 Support Team

VALU established the VALU 508 Support Team as a resource to assist all VALU employees with the preparation and submission of Section 508 compliance required documentation. This assistance includes performing audits of submitted VALU projects to verify compliance with Section 508 requirements prior to submitting the project to VA Section 508 for certification with Section 508 requirements. The VALU 508 Support Team also notifies product vendors of any noncompliance issues revealed through their audits.

Appendix B Potential Monetary Benefits in Accordance With Inspector General Act Amendments

Recommendation	Explanation of Benefits	Better Use of Funds	Questioned Costs
1	Costs associated with remediation of issues from the prior contract	\$34,011	\$0
Total		\$34,011	\$0

Appendix C Management Comments – Office of Human Resources and Administration

Department of Veterans Affairs

Memorandum

Date: March 2, 2016
From: Assistant Secretary for Human Resources and Administration (006)
Subj: Draft Report: Review of Alleged Noncompliance with Section 508 of the Rehabilitation Act on MyCareer@VA Web Site; Project Number 2015-02781-R1-0146
To: Assistant Inspector General for Audits and Evaluations (52)

1. This is in response to the Office of Inspector General (OIG) Draft Report: Review of Alleged Noncompliance with Section 508 of the Rehabilitation Act on MyCareer@VA Web Site; Project Number 2015-02781-R1-0146. The Office of Human Resources and Administration (HR&A) concurs with the report and provides the ongoing corrective actions outlined below.

RECOMMENDATION 1: We recommended the Assistant Secretary for the Office of Human Resources and Administration correct all Section 508 compliant issues with the MyCareer@VA Web site and seek certification of Section 508 compliance from the appropriate component within VA Section 508.

CONCUR: HR&A concurs with recommendation and has taken steps to correct all Section 508 compliant issues with the MyCareer@VA Web Site and will seek certification and compliance from VA Section 508 for this and all future Electronic Information and Technology (EIT) products. In early 2015, the VA Learning University (VALU) 508 Office, using the Accessibility Module Platform (AMP), provided the MyCareer@VA team with 1,643 individual non-compliant issues. These issues were categorized into 403 unique issues due to duplicity. Between August and November 2015, the MyCareer@VA team worked closely with the VALU 508 Office to determine remediation activities for the 403 issues. As of November 2015, the team has addressed all 403 Section 508 issues. Moving forward, VALU will continue to work collaboratively with VA Section 508 Office to identify and remediate any potential 508 issues and seek certification as defined in the revised Office of Information and Technology policy.

RECOMMENDATION 2: We recommended the Assistant Secretary for the Office of Human Resources and Administration develop and implement a process to ensure their products conform with Section 508 requirements prior to their deployment, which includes defining what support is required to document a product's compliance with Section 508 requirements.

CONCUR: VALU, in collaboration with VA Section 508 Office, has implemented processes to ensure EIT products developed conform to Section 508 requirements. These processes include:

- the mandatory use of the standardized AMP tool to conduct periodic scans of the site;
- a bi-weekly meeting with VALU officials, the contractor, and VALU 508 Support Team officials to discuss status of items under Section 508 review and potential remediation actions;
- the implementation of a Section 508 tracker that documents status of outstanding Section 508 tickets reviewed monthly or more frequently with VALU officials; and
- engagement of VALU 508 Support Team officials at the beginning of the development process of any new EIT products, as well as, participation in monthly program review meetings.

RECOMMENDATION 3: We recommended the Assistant Secretary for the Office of Human Resources and Administration provide and require training for all individuals involved in developing and maintaining products to ensure they are aware of the requirements and expectations for conformance with Section 508 requirements.

CONCUR: The following training courses are offered to individuals involved with all aspects of EIT products: Introduction to Section 508, Section 508 for Project Managers, Buy Accessible Wizard, High Impact Web Accessibility Fixes, Window-Eyes Three-Day Script Writing Training, Introduction to Dragon Medical, Creating Accessible Microsoft Products. VALU also offers courses on TMS and sponsors brown bag lunch information sessions conducted by the VALU 508 Office.

OIT is developing a VA policy to establish Section 508 compliance procedures and training on those procedures. Once this policy is in place, VALU will include additional training in accordance with the policy.

2. Based on the processes that have been implemented, I recommend this review be closed.
3. If you have any questions or concerns, please contact Cynthia Manurs, Chief Budget and Risk Officer, Human Resources and Administration, of my staff at (202) 461-5170.

(original signed by:)

GINA S. FARRISEE

Appendix D Management Comments – Office of Information and Technology

**Department of
Veterans Affairs**

Memorandum

Date: March 8, 2016
From: Assistant Secretary for Information and Technology (005)
Subj: Draft Report, Review of Alleged Noncompliance with Section 508 of the Rehabilitation Act on MyCareer@VA Web site, Project # 2015-02781-R1-0146
To: Assistant Inspector General for Audits and Evaluations (52)

Thank you for the opportunity to review the Office of Inspector General (OIG) draft report, *"Review of Alleged Noncompliance with Section 508 of the Rehabilitation Act on MyCareer@VA Web site."* The Office of Information and Technology concurs with the findings and recommendations and submits the attached comments for inclusion in the OIG's final report. If you have any questions, contact me at (202) 461-6910 or have a member of your staff contact Rob C. Thomas II, Deputy Assistant Secretary, Enterprise Program Management Office, at 727-502-1382.

(original signed by:)

LaVERNE H. COUNCIL

Office of Information and Technology
Comments on OIG Draft Report,
Review of the alleged 508 Noncompliance with Section 508 of the Rehabilitation Act on the
MyCareer@VA Web site

OIG Recommendation 1: *We recommended the Assistant Secretary for the Office of Human Resources and Administration correct all Section 508 compliance issues with the MyCareer@VA Web site and seek certification of Section 508 compliance from the appropriate component within VA Section 508.*

Comments: Concur. Defer to the Office of Human Resources and Administration (HR&A) as the owner of this recommendation. OI&T will support HR&A's efforts to bring the MyCareer@VA web site into compliance as needed.

OIG Recommendation 2: *We recommended the Assistant Secretary for the Office of Human Resources and Administration develop and implement a process to ensure their products conform with Section 508 requirements prior to their deployment, which includes defining what support is required to document a product's compliance with Section 508 requirements.*

Comments: Concur. Defer to the Office of Human Resources and Administration (HR&A) as the owner of this recommendation. OI&T will support HR&A's efforts to bring their products into compliance as needed.

OIG Recommendation 3: *We recommended the Assistant Secretary for the Office of Human Resources and Administration provide and require training for all individuals involved in developing and maintaining products to ensure they are aware of the requirements and expectations for conformance with Section 508 requirements.*

Comments: Concur. Defer to the Office of Human Resources and Administration (HR&A) as the owner of this recommendation. OI&T will support HR&A's efforts with standard and customized training as needed.

OIG Recommendation 4: *We recommended the Assistant Secretary for Information and Technology strengthen policy to ensure Electronic and Information Technology products are compliant with Section 508 prior to their deployment, which includes providing an expectation of when to establish compliance, how to document compliance, and what specifically constitutes compliance with Section 508.*

Comments: Concur. VA OI&T considers our approach to ensuring 508 compliance and access to be an evolving solution set. As our technology tools and systems change, we continually update our guidance and processes to adapt to the environment. VA is committed to providing access to our sites and systems, and will be working with our partners in HR&A and updating our guidance to better serve that effort moving forward.

The following directive and memoranda provide specific guidance for Section 508 compliance prior to deployment:

- *VA Directive 6221, Accessible Electronic and Information Technology (EIT)*, released 12/01/2008, planned update 12/31/2016.
- *Section 508 Compliance Processes for Project Teams*; released 01/10/2013, planned update 01/31/2017.
- *Section 508 Compliance Enforcement for Software and Application*; released 07/26/2012, planned update 01/31/2017.
- *Section 508 Compliance Requirement for VA SharePoint sites*; released 11/01/2012, planned update 02/15/2017.
- *Section 508 Compliance Enforcement for VA Internet and Intranet Websites*; released 07/26/2012, planned update 03/30/2017.

The Section 508 law does not provide clear specifications as to what constitutes 508 compliance. The Section 508 Office determination is that in order to achieve minimally acceptable conformance, there should be no serious or critical issues. All issues, including minor and moderate, need to be remediated in order to achieve full conformance. The test findings serve to document the level of 508 compliance.

Appendix E **OIG Contact and Staff Acknowledgments**

OIG Contact	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
Acknowledgments	Nick Dahl, Director Ronald Comtois Zachery Jensen Jennifer Leonard

Appendix F Report Distribution

VA Distribution

Office of the Secretary
Office of Human Resources and Administration
Office of Information Technology
Veterans Health Administration
Veterans Benefits Administration
National Cemetery Administration
Assistant Secretaries
Office of General Counsel

Non-VA Distribution

House Committee on Veterans' Affairs
House Appropriations Subcommittee on Military Construction,
Veterans Affairs, and Related Agencies
House Committee on Oversight and Government Reform
Senate Committee on Veterans' Affairs
Senate Appropriations Subcommittee on Military Construction,
Veterans Affairs, and Related Agencies
Senate Committee on Homeland Security and Governmental Affairs
National Veterans Service Organizations
Government Accountability Office
Office of Management and Budget

This report is available on our Web site at www.va.gov/oig.