TALENT MANAGEMENT SYSTEM (TMS) E-LEARNING SECTION 508

1. **REASON FOR ISSUE**: This Directive establishes policy for course developers and VA program offices to verify Section 508 compliance of E-Learning products.

2. **SUMMARY OF CONTENTS/MAJOR CHANGES**: This Directive will allow VA program offices and course developers several methods to obtain 508 compliance of e-Learning products. This Directive will:

   a. Provide guidance to VA Program Offices and course developers on how to verify and ensure compliance with Section 508 requirements,

   b. Expedite Section 508 verification process of related e-Learning products that meet certain common requirements,

   c. Lessen the burden on 508 Offices within the VA by providing expedited methods that can be used by e-Learning developers to better prepare e-Learning products for 508 compliance reviews,

   d. Enable a faster review by the 508 offices,

   e. Identify the responsible office.

3. **RESPONSIBLE OFFICE**: Office of the Assistant Secretary for Human Resources and Administration (006), VA Learning University (006V).

4. **RELATED HANDBOOK**: VA Handbook 6221, *Accessible Electronic and Information Technology*.

5. **RESCISSION**: None

CERTIFIED BY:

BY DIRECTION OF THE SECRETARY OF VETERANS AFFAIRS:

/s/
Roger W. Baker
Assistant Secretary for
Information and Technology

/s/
John U. Sepúlveda
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TALENT MANAGEMENT SYSTEM (TMS) E-LEARNING SECTION 508

1. PURPOSE and SCOPE:

a. This Directive describes methods that VA program offices and course developers may use to obtain validation that e-Learning products they produce meet criteria as Section 508 compliant. Under the Directive it is the responsibility of VA programs offices and employees developing and/or procuring e-Learning to ensure that their e-Learning products are accessible according to Section 508 of the Rehabilitation Act, as well as VA Directives 0003, Technical Specifications and Design Standards for Learning and 6221, Accessible Electronic and Information Technology (EIT).

b. VA Directive 0003 established the responsibility and authority to the Dean, VA Learning University (VALU) for the development and enforcement of technical specifications and design standards of training developed or procured and made available by the VA Talent Management System (TMS). The technical specifications referenced include compliance with Section 508 of the Rehabilitation Act, as amended (Title 29 United States Code 794d).

c. VA Directive 0003, Technical Specifications and Design Standards for Learning supports VA Directive 6221, Accessible Electronic and Information Technology (EIT) which assigns administrative responsibility to the Assistant Secretary for Information and Technology, Chief Information Officer (CIO), to ensure that VA's EIT is accessible by VA employees and members of the public with disabilities.

2. POLICY: It is the responsibility of VA program offices and employees developing and/or procuring e-Learning to ensure e-Learning products are accessible according to regulation (Section 508 of the Rehabilitation Act) and VA Directives 0003 and 6221. This policy provides guidance to VA program offices and course developers on how to verify and ensure compliance with Section 508 requirements:

a. VA employees developing and/or acquiring e-Learning products must have their e-Learning products tested by a VA 508 office to verify that they are compliant with Section 508 of the Rehabilitation Act. Software applications are commercially available to test the compliance of products. However, currently none are able to test for all Section 508 criteria. Therefore, manual supplemental testing must be used in combination with automated software. This Directive sets forth several different ways to verify the 508 compliance of e-Learning products for publication in VA TMS:

(1) The VA mandatory/required e-Learning courses must be validated as 508 compliant by the appropriate VA 508 Office before publication in VA TMS. To determine which 508 Office to submit your e-Learning product to for review and validation of 508 conformances, submit your e-Learning products to the Veterans Health Administration 508 Office if the content of your product includes Healthcare or clinical subject matter, or if the content is only targeted specifically to VHA staff. All other e-Learning products shall be submitted to the VA Section 508 Program Office for review

and 508 conformance validation. VA mandatory/required training is training that is officially identified as such, and is included on the VA Mandatory training Web site (http://vaww.ees.lrn.va.gov/Training/mandatory/);

(2) Official VA validation of Section 508 compliance of products or systems can be accomplished by submission of the product or system for review by either the VHA 508 Office or the VA Section 508 Program Office depending upon the criteria for submission. Products can be submitted to these offices either as completed products or as products in development so that the developers may receive guidance from those offices. See the InsideTMS site, 508 Compliance section (http://www.insidelms.va.gov/insideLMSpages/508.shtm) for details about submitting requests to those offices;

(3)   Related e-Learning products meeting certain common requirements may be verified as Section 508 compliant in the expedited process called Testing of a Unified Group of Courses (TUG process). This process allows one product in a series of products validated as Section 508 compliant by either of the VA 508 offices mentioned in paragraph 2. a. (2), and the remaining courses in the series are corrected as necessary. The remaining related courses are reviewed by the appropriate 508 Office to verify the course is 508 compliant. The remainder of courses will require less review time using this process. (Please see link in paragraph 2);

(4)   VA program or project managers shall ensure that their e-Learning products are Section 508 compliant. They must have checked their products thoroughly using manual methods or a combination of manual and automated methods to ensure the products are fully Section 508 compliant before submitting them for validation by the appropriate VA 508 office.

b.   Note that all VA contracts must contain contract language requiring that e-Learning products and systems be Section 508 compliant. The deliverables must be checked by VA before acceptance to ensure they meet VA Section 508 compliance requirements as determined by VA.

c.   If any e-Learning products published in the VA TMS are found to be inaccessible to disabled employees, the responsible VA program office must immediately identify and correct the deficiencies and then have the corrected product validated as compliant by the appropriate 508 Office. The responsible VA program office must repair the non-conformant product in TMS within 10 business days from the date the item was found to be inaccessible to disabled employees. If the product's accessibility deficiencies are unable to be corrected and published in TMS within 10 business days from the time the product was identified as non-compliant, an accessible text-only version of the product must be added to TMS to enable disabled persons access to the entire content contained in the non-conformant product. The responsible VA program office must take action to correct the item starting the same day the item is found to be non-compliant and continuing until the original item is correct, certified by the appropriate 508 Office, and reposted to the TMS. Immediately upon replacement of the conformant item, the temporary text-only version must be removed from the TMS.

d. The VA Section 508 Program Office or the VHA 508 Program Office may spot check published e-learning products available through TMS for 508 compliance. E-learning products found non-compliant shall be evaluated by the business owner to determine whether the course content is current and accurate and appropriate for continued availability. If deemed no longer need the course will be removed from the TMS. If the course is still needed, it will be removed from access in TMS while the course is revised, so as to contain current and accurate course content and be validated as 508 compliant following the process outlined in paragraph 2 of this policy.

3. RESPONSIBILITIES:

a.   Office of Information Technology: Section 508 Offices

(1)   The review and validation of e-Learning products available through TMS;

(2)   The coordination of technical infrastructure requirements between VALU and VA IT (e.g. computer settings, etc.);

b.   Assistant Secretary Human Resources Administration (HR&A) responsibility to the Dean, VALU

(1)   The coordination of technical infrastructure requirements between VALU and VA IT (e.g. computer settings, etc.);

(2) The development and revision of all VA TMS technical specifications and all design standards pertaining to the development and operation of e-learning in context with VA infrastructure and VA TMS;

(3) Defining the requirements for all VALU Learning Infrastructure content integration in TMS;

(4) The management and operation of VA TMS.

c. VA Program Offices and Course Developers. Their e-Learning products are to be accessible according to regulation (Section 508 of the Rehabilitation Act) and VA Directives 0003 and 6221.

4. REFERENCES:

a. Section 508 of the Rehabilitation Act as amended (Title 29 United States Code 794d)

b. VA Directive 0003, Technical Specifications and Design Standards for Learning

    c. VA Directive 6221, Accessible Electronic and Information Technology

5. **DEFINITIONS.**

    a. **E-Learning product.** Any education or learning product (e.g., online course, Word document, PowerPoint presentation, video, etc.) that is delivered using the VALU Learning Infrastructure or any other Web-based delivery methodology using electronic user interfaces.

    b. **Talent Management System (TMS).** VA's enterprise-level software application designed to support performance management; education and learning management; and career and succession planning processes to retain and foster continuing development of skills and competencies needed to achieve the VA goals and long-term strategic objectives. It is a Web-based application that serves as a single point of access and system of record for education and training of VA employees.