Compliancy Solutions

A BUSINESS CASE FOR DELIVERING QUALITY ELEARNING WITH 100% 508 COMPLIANCE
GEORGE MASON UNIVERSITY – EDIT 706
CHRISTOPHER B HUGHES
Executive Summary
The key conclusions of this business case are that 30% of our eLearning courses are not 508 compliant. Currently students are not able to complete our non 508 compliant eLearning courses for certification. Upon discovery of the student issue, our designers are required to stop their current tasks for days and develop a workaround for the student so they may receive course certification and continue working. Our development of non 508 compliant courses results in a disruptive workflow for our students and loss of productivity for our eLearning development team. In order to meet ABC Agency quality and 508 compliance standards in 100% of our eLearning courses, this business case offers alternative solutions to consider to remedy the issues. Each alternative solution comes with advantages, disadvantages, assumptions and risks.

Nature of the Learning Challenge

Background
Providing quality eLearning content to government employees is part ABC Agency’s mission. As a training office within ABC Agency, meeting our mission responsibility ensures that all our students may effectively access quality eLearning content for certification and complete their daily tasks. As part of Section 508 of the Rehabilitation Act (508), accommodations are required for government employees and persons with disabilities to access government information through electronic media. Not providing quality 508 compliant eLearning results in a negative impact on students, and disrupts performance of eLearning production to develop poor quality substitutes for training.

Learning Challenge
ABC Agency’s Disabilities Office provides a free three day course designed to teach ABC Agency employees and contractors how to identify, and design 508 compliant online and eLearning products. This course provides an ABC Agency specific version of the Web Content Accessibility Guidelines 2.0 (ABCWAG) to meet 508 accessibility requirements.

Student survey data, external office reporting and preliminary ABCWAG testing revealed at least 30 of our 100 eLearning media products do not qualify as accessible under the 508 Act. When confronted by students with providing an accessible alternative, we stop production on current products to create a text document to substitute a quality eLearning course. Currently we are designing eLearning products that may not meet 508 accessibility compliance and diverting productivity hours to create text documents to substitute quality eLearning media content.

Forming a strategic alignment of ABC Agency’s mission goal of providing quality eLearning with the greater government 508 accessibility requirement ensures 100% of our eLearning products meeting 508 accessibility compliance.

This business case aims to address the challenge of increasing our current 70% compliance to 100% compliance in the delivery of quality 508 accessible eLearning content to government employees.

Alternatives to Consider
This business case outlines four alternatives to consider as solutions to this learning challenge. We believe Alternative 4 to be the most strategically aligned with ABC Agency’s mission goal of providing quality eLearning content and meeting government 508 accessibility compliance requirements.
Alternative 1: Maintain the Status Quo

Maintain the status quo and not align eLearning mission goal with government compliance of 508 accessibility.

Advantages:
- No changes to the production time of eLearning products.
- No loss in productivity to learn how to identify, design and approve 508 compliant eLearning products.

Disadvantages:
- Does not address the mission goal of ensuring that all our students may effectively access eLearning content for certification and complete their daily tasks.
- Does not address the government requirement for providing 508 accessible content for government employees.
- Does not address the issue of new eLearning course compliance with 508 accessibility guidelines.
- Does not address the issue of continued tasking and approval by government leaders for eLearning products not in compliance with 508 accessibility requirements.
- Does not address the issue of contractors tasked to design eLearning products not in compliance with 508 accessibility requirements.
- Does not address the issue of lost productivity by government employees as they wait for a text document instead of eLearning materials to be provided.
- Does not address the issue of lost productivity time by government students, leadership and contractors to design and approve a text document for those who are unable to access the course due to non-508 compliance.
- Does not address the issue of 30 eLearning courses currently not in compliance with 508 accessibility guidelines.

Assumptions of what must be in place for the alternative to work:
- Students will contact ABC Agency’s training office to politely request 508 accessible eLearning products are provided.
- Students and their supervisors will wait patiently for a text document solution to be designed and approved by our government leadership and contractors.
- Tasking and approval by government leaders for a text document product is in compliance with 508 accessibility requirements.
- Government leadership already possesses a shared baseline of knowledge as contractors for identifying, designing, tasking and approving 508 accessible eLearning media products with no training required.
- Contractors already possesses the same baseline of knowledge as government leaders for identifying and designing, 508 accessible eLearning media products with no training required.
- Loss of productivity time for each text document design is about 58 hours.

Risk of potential events that are beyond our control:
- Students will contact ABC Agency’s Disabilities Office to inquire why we have not produced our eLearning in compliance with the 508 Act.
- Student misses career opportunity for not receiving a quality eLearning course certification in a timely manner.
- Student files an official complaint against the government and ABC Agency for not providing 508 accessible eLearning content.
**Alternative 2: Government Leaders Attend Accessibility Training**

Government media and Instructional Systems Designer (ISD) personnel are the project leaders and require a baseline knowledge of how to identify, design and approve 508 accessible eLearning products. There are currently half as many government employees as contractors, and their responsibilities are primarily as project leads and approvers. Providing training would ensure leadership knowledge of how to technically implement the ABCWAG standards for eLearning products. All existing non-compliant and all new products will be designed and approved according to the new standards, with 508 accessibility in mind.

**Advantages:**
- Partially addresses the mission goal of ensuring that all our students may effectively access eLearning content for certification and complete their daily tasks.
- Partially addresses the government requirement for providing 508 accessible content for government employees.
- Partially addresses the issue of new eLearning course compliance with 508 accessibility guidelines.
- Addresses the issue of providing government leadership a shared baseline of knowledge for identifying and designing 508 accessible eLearning media products.
- Addresses the issue of continued tasking and approval by government leaders for eLearning products not in compliance with 508 accessibility requirements.
- Partially addresses the issue of 30 eLearning courses currently not in compliance with 508 accessibility guidelines.

**Disadvantages:**
- Does not address the issue of providing contractors a shared baseline of knowledge for identifying and designing 508 accessible eLearning media products.
- Does not address the issue of lost productivity by government employees as they wait for a text document to be provided.
- Does not address the issue of lost productivity time by government leadership and contractors to design and approve a text document solution for those students who are unable to access the course due to non-508 compliance.
- Does not address the issue of 30 eLearning courses currently not in compliance with 508 accessibility guidelines.
- Adjusted new project productivity time for retrofitting eLearning products.
- Only 33% of workers have 508 accessibility knowledge to devote their work load for rapid 508 compliant eLearning course production.
- Loss of productivity time for a total of 144 hours of training.
- Loss of productivity time for each text document accessible design is about 58 hours.

**Assumptions of what must be in place for the alternative to work:**
- Contractors who comprise two-thirds of the workforce, already possesses the same baseline of knowledge as government leaders for identifying and designing 508 accessible eLearning media products with no training required.

**Risk of potential events that are beyond our control:**
- Students will contact ABC Agency’s Disabilities Office to inquire why we have not produced our eLearning in compliance with the 508 Act.
- Student misses career opportunity for not receiving a quality eLearning course certification in a timely manner.
- Student files an official complaint against the government and ABC Agency for not providing 508 accessible eLearning content.
Alternative 3: Contractors Attend Accessibility Training

Multimedia and ISD contractors have built the existing eLearning products, and are well versed in the technologies that built them. There are twice as many contractors as government employees to implement the 508 accessibility updates. Government employees as project leaders will not know how to identify, design or evaluate ABCWAG standards for approving 508 compliant eLearning products. Products may be tasked or approved without leadership fully understanding the standards, processes, level of effort or timelines involved in making an eLearning course compliant. Contractors alone will know how to technically implement the ABCWAG standards for eLearning products.

Advantages:
- Partially addresses the mission goal of ensuring that all our students may effectively access eLearning content for certification and complete their daily tasks.
- Partially addresses the government requirement for providing 508 accessible content for government employees.
- Partially addresses the issue of new eLearning course compliance with 508 accessibility guidelines.
- Addresses the issue of providing contractors a common baseline of knowledge for identifying and designing 508 accessible eLearning media products.
- Partially addresses the issue of 30 eLearning courses currently not in compliance with 508 accessibility guidelines.
- Only 67% of workers have 508 accessibility knowledge to devote their work load for rapid 508 compliant eLearning course production.

Disadvantages:
- Does not address the issue of continued tasking and approval by government leaders for eLearning products not in compliance with 508 accessibility requirements.
- Does not address the issue of contractors tasked to design eLearning products not in compliance with 508 accessibility requirements.
- Does not address the issue of lost productivity by government employees as they wait for a text document to be provided.
- Does not address the issue of lost productivity time by government leadership and contractors to design and approve a text document solution for those students who are unable to access the course due to non-508 compliancy.
- Adjusted new project productivity time for retrofitting eLearning products.
- Loss of productivity time for a total of 336 hours of training.
- Loss of productivity time for each text document design is about 58 hours.

Assumptions of what must be in place for the alternative to work:
- Government leadership already possesses a shared baseline of knowledge as contractors for identifying, designing, tasking and approving 508 accessible eLearning media products with no training required.

Risk of potential events that are beyond our control:
- Students will contact ABC Agency’s Disabilities Office to inquire why we have not produced our eLearning in compliance with the 508 Act.
- Student misses career opportunity for not receiving a quality eLearning course certification in a timely manner.
- Student files an official complaint against the government and ABC Agency for not providing 508 accessible eLearning content.
Alternative 4: Both Government Leaders and Contractors Accessibility Training

All leadership and technical persons involved in the creation and approval chain for eLearning production have the same knowledge base for meeting the requirements of 508 accessibility. A full workforce with a shared knowledge of 508 accessible design capable of distributing productivity time between redesign and new eLearning courses. Plans for existing non-compliant 508 courses and all new products will be designed and approved based on ABCWAG specifications, with 508 accessibility in mind.

Advantages:

- Addresses the mission goal of ensuring that all our students may effectively access eLearning content for certification and complete their daily tasks.
- Addresses the government requirement for providing 508 accessible content for government employees.
- Partially addresses the issue of new eLearning course compliance with 508 accessibility guidelines.
- Addresses the issue of providing government leadership a common baseline of knowledge for identifying and designing 508 accessible eLearning media products.
- Addresses the issue of continued tasking and approval by government leaders for eLearning products not in compliance with 508 accessibility requirements.
-Addresses the issue of providing contractors a common baseline of knowledge for identifying and designing 508 accessible eLearning media products.
- Addresses the issue of lost productivity by government employees as they wait for a text document to be provided.
- Addresses the issue of lost productivity time by government leadership and contractors to design and approve a text document solution for those students who are unable to access the course due to non-508 compliancy.
- Addresses the issue of 30 eLearning courses currently not in compliance with 508 accessibility guidelines.
- 100% of workers have 508 accessibility knowledge to devote their work load for rapid 508 compliant eLearning course production.

Disadvantages:

- Adjusted new project productivity time for retrofitting eLearning products.
- Loss of productivity time for a total of 480 hours of training.
- Loss of productivity time for each text document design is about 58 hours.

Assumptions of what must be in place for the alternative to work:

- Government leadership and contractors receive a shared baseline of knowledge across two training sessions, for identifying, designing, tasking and approving 508 accessible eLearning media products with no training required.

Risk of potential events that are beyond our control:

- Students will contact ABC Agency’s Disabilities Office to inquire why we have not produced our eLearning in compliance with the 508 Act.
- Student misses career opportunity for not receiving a quality eLearning course certification in a timely manner.
- Student files an official complaint against the government and ABC Agency for not providing 508 accessible eLearning content.
Financial Metrics and Measures

The ABC Agency specific content allows for both contractors and government employees to attend the training free of charge. Cost associated with each alternative is measured in product development time diverted for training, creating a text document as course substitute, and creating 508 accessible redesign. It does not include lost productivity time by students waiting for a text document solution nor does it include development time for new 508 compliant courses. For future text document substitutes, Alternative 1 provides an accurate estimate of diverted productivity hours per project.

<table>
<thead>
<tr>
<th>Alternatives</th>
<th>Accessibility Training</th>
<th>Text Document Design x 30 existing products</th>
<th>508 Accessibility Redesign x 30 existing products</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alternative 1</td>
<td>No Training</td>
<td>2 hours – Task, Approve 24 hours – Re-design content 32 hours – Re-design delivery 2 + 24 + 32 = 58 hours (diverted per text document) 58 x 30 = 1740 hours (diverted)</td>
<td>N/A</td>
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<tr>
<td>Alternative 2</td>
<td>6 Gov’t employees 24 training hours 6 x 24 = 144 hours (diverted)</td>
<td>N/A</td>
<td>30 existing products 2 hours ea. content design 30 x 2 = 60 hours 30 existing products 24 hours ea. delivery design 30 x 24 = 720 hours 60 + 720 = 780 hours (diverted)</td>
</tr>
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</tr>
<tr>
<td>Alternative 3</td>
<td>14 Contractors 24 training hours 14 x 24 = 336 hours (diverted)</td>
<td>N/A</td>
<td>30 existing products 2 hours ea. content design 30 x 2 = 60 hours 30 existing products 24 hours ea. delivery design 30 x 24 = 720 hours 60 + 720 = 780 hours (diverted)</td>
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</tr>
<tr>
<td>Alternative 4 (RECOMMENDED)</td>
<td>6 Gov’t employees 14 Contractors 24 training hours 6 + 14 x 24 = 480 hours (diverted)</td>
<td>N/A</td>
<td>30 existing products 2 hours ea. content design 30 x 2 = 60 hours 30 existing products 24 hours ea. delivery design 30 x 24 = 720 hours 60 + 720 = 780 hours (diverted)</td>
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Return on Investment

Returns associated with each Alternative are calculated with the business objective to provide quality eLearning to government employees and with attaining 100% eLearning product compliance in compliance with the 508 Act.

Alternative 1: Maintain Status Quo

Return on investment to Maintain Status Quo would ensure only 70% or less* of eLearning products offered as being 508 compliant. Non 508 compliant eLearning products would continue to be offered to employees, hinder student ability to obtain certification, and delay regular work performance by students and designers while a text document substitute for quality eLearning is created.

Alternative 2: Government Leaders Accessibility Training

The return on investment for Government Accessibility Training would ensure only 70% or less* of eLearning products offered as being 508 compliant. Only the 33% of office comprised by government leadership would receive training for the capability to recognize, design and approve 508 compliant eLearning products. Government leadership could ensure approval and limited production of 508 compliant eLearning products.

Alternative 3: Contractors Accessibility Training

The return on investment for Contractor Accessibility Training would ensure only 70% or less* of eLearning products offered as being 508 compliant. Only the 76% of office comprised by contractor media and instructional designers would receive the training for understanding how to retrofit existing, and design new 508 compliant eLearning products. Contractors would have capability to create 508 compliant eLearning products, though compliance enforcement does not take place without government leadership trained in 508 compliancy.

Alternative 4: Both Government Leaders and Contractors Accessibility Training

The return on investment for Both Government and Contractor Accessibility Training would ensure 100% of eLearning products offered as being 508 compliant. All 100% of the technical media, instructional designers and approving government leadership would receive the same level of understanding and capability to retrofit existing, and design new 508 compliant eLearning products.

*Over time, continued production of non 508 compliant products would lower the overall product compliancy percentage.

Business Impact of Each Alternative

Alternative 1: Maintain Status Quo

Government employees and contractors continue to create text document substitutes for quality eLearning courses in a reactionary response to providing a non 508 compliant eLearning course.

- Students requiring accessible content receive their required certification two weeks after peers.
- Students may not perform their assigned tasks until a text document substitution is provided.
- Government employee approvers and design leads must devote time to evaluate, assign and approve a text document substitute for a quality eLearning product.
- Government employees must divert time from evaluation, assignment and approval of new eLearning products.
• Contractor media and designers must devote time to evaluate, design and deliver a text document substitute for a quality eLearning product.
• Contractor media and designers must divert time from design and delivery of new eLearning products.

The business impact of this alternative results in perpetual time being taken away from students, government employees and contractors to support the production of poor quality eLearning substitutes and non 508 compliant eLearning products. Observable success is measured by students eventually receiving certification through completion of a text document substitute for quality 508 compliant eLearning.

Alternative 2: Government Leaders Accessibility Training
Representing 33% of the office, government leaders, media and ISD employees attend ABC Agency training to receive a baseline knowledge of how to identify, design and approve 508 accessible eLearning products.
• Students requiring accessible content receive quality 508 compliant eLearning.
• Students requiring accessible content experience may experience a delay in course completion until quality 508 compliant eLearning is designed and delivered.
• Students may not perform their assigned tasks until a text document substitution is provided.
• Government employee approvers and design leads must devote time to evaluate, assign and approve converted courses into a 508 accessible eLearning products.
• Government employees must divert time from evaluation, assignment and approval of new 508 compliant eLearning products.
• Contractor media and designers do not attend the training.
• Contractor media and designers continue to develop non 508 compliant eLearning products.
• Contractor media and designers may experience delayed production time for 508 compliant eLearning products due to not having baseline knowledge of how to design 508 accessible eLearning products.

The business impact of this alternative results in only government employee time being diverted from current projects for ABC Agency training in the production of quality 508 compliant eLearning products. Observable success is measured by only government employees receiving ability to identify, approve and technically implement the ABCWAG standards for eLearning products and more than 70% of student certifications received via 508 compliant eLearning products.

Alternative 3: Contractors Accessibility Training
Representing 67% of the office, contractor media and ISD’s attend ABC Agency training to receive a baseline knowledge of how to identify and design 508 accessible eLearning products.
• Students requiring accessible content receive quality 508 compliant eLearning.
• Students requiring accessible content experience may experience a brief delay in course completion until quality 508 compliant eLearning is designed and delivered.
• Students may not perform their assigned tasks until a text document substitution is provided.
• Government employee approvers and design leads do not attend the training.
• Government employee approvers and design leads continue to approve non 508 compliant eLearning products.
• Government employee approvers and design leads may experience delayed production time for 508 compliant eLearning products due to not having baseline knowledge of how to identify, design or approve 508 accessible eLearning products.

The business impact of this alternative results in only government employee time being diverted from current projects for ABC Agency training in the production of quality 508 compliant eLearning products. Observable success is measured by only government employees receiving ability to identify, approve and technically implement the ABCWAG standards for eLearning products and more than 70% of student certifications received via 508 compliant eLearning products.
• Contractor media and designers must devote time for training, design and delivery of converted courses into a 508 accessible eLearning product for government leader approval.
• Contractor media and designers must divert design time from new and existing eLearning products.

The business impact of this alternative results in only contractor media and ISD’s time being diverted from current projects for ABC Agency training in the production of quality 508 compliant eLearning products. Observable success is measured by only contractor media and ISD’s receiving ability to design and deliver the ABCWAG standards for eLearning products and more than 70% of student certifications received via 508 compliant eLearning products.

**Alternative 4: Both Government Leaders and Contractors Accessibility Training**

Representing 100% of the office, all government employees, contractor media and ISD’s attend ABC Agency training to receive a shared baseline knowledge of how to identify and design 508 accessible eLearning products.

• Students requiring accessible content receive quality 508 compliant eLearning.
• Students requiring accessible content experience may experience a brief delay in course completion until quality 508 compliant eLearning is designed and delivered.
• Students may not perform their assigned tasks until a text document substitution is provided.
• Government employee approvers and design leads must devote time to evaluate, assign and approve converted courses into a 508 accessible eLearning products.
• Government employees must divert time from evaluation, assignment and approval of new 508 compliant eLearning products.
• Contractor media and designers must divert time for training, design and delivery of converted courses into a 508 accessible eLearning product for government leader approval.
• Contractor media and designers must divert design time from new and existing eLearning products.

The business impact of this alternative results in all government employees, contractor media and ISD’s time being diverted from current projects for training in the production of quality 508 compliant eLearning products. Observable success is measured by a 100% shared ABC Agency knowledge to design and deliver the ABCWAG standards for 508 compliant eLearning products and 100% of student certifications received via 508 compliant eLearning products.

**Conclusion and Recommendation**

**Conclusion**

The ABC Agency mission is to provide quality eLearning solutions. The government is required to provide 508 compliant eLearning access. Providing a text document script may allow access to course material however it is not an equivalent eLearning course solution, and negates the purpose of creating an interactive eLearning course. Students should not have to delay work performance while a text document substitute for non 508 compliant eLearning is developed. Government project leaders should not be subject to identify, approve and implement 508 accessibility compliant eLearning products without having the ABC Agency baseline knowledge of 508 accessibility compliancy. Lastly, contractors should not be expected to design or deliver 508 compliant eLearning products without an ABC Agency baseline of knowledge for 508 compliancy.

**Recommendation**

The best option for the government students, government leadership and contractors is to provide respective members of the design team with the consistent baseline of knowledge they need to identify,
design, approve and deliver quality 508 accessible eLearning products. **Both Government and Contractor Accessibility Training** is the optimal choice for meeting both the ABC Agency’s mission of providing quality eLearning media content to government employees as well as the government requirement to provide 508 accessible eLearning media content.

**High-level Implementation and Evaluation Plan**

Two evenly distributed teams complete the ABC Agency training by staggering their attendance by one month to provide office coverage and continuity of business. Each team consists of two government ISD’s, one government multimedia person, four contracted ISD’s and three contracted multimedia persons. Sixteen business days is the estimated completion for 15 course conversions by each team. By the end of 40* business days, a total of 30 course conversions will be completed. Completion of the initiative will be measured in the successful conversion of 30 existing non 508 compliant eLearning products. After the successful conversion of 30 existing non 508 compliant eLearning products, 100% of all eLearning products will be 508 compliant.

Team one attends the three day training and then returns to examine the design of 15 existing eLearning products. Six ISD’s would take one day to determine what steps were needed to complete the redesigns. With government leadership approval, four multimedia persons would take three business days per course to carry out the task of delivery. After 12 business days, Government leadership would ensure all redesigns were compliant with 508 accessibility and adherence to ABCWAG specifications.

The following month, team two attends the three day training and then returns to examine the design of 15 existing eLearning products. Six ISD’s would take one day to determine what steps were needed to complete the redesigns. With government leadership approval, four multimedia persons would take three business days per course to carry out the task of delivery. After 12 business days, Government leadership would ensure all redesigns were compliant with 508 accessibility and adherence to ABCWAG specifications.

<table>
<thead>
<tr>
<th>Team 1</th>
<th>Gov.</th>
<th>Cont.</th>
<th>Task Hours</th>
<th>Total Hours</th>
<th>Business Days</th>
<th>Team 1 % of Product LOE</th>
<th>Team 2 % of Product LOE</th>
<th>Total % of 508 Products</th>
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</tr>
<tr>
<td>Training</td>
<td>3</td>
<td>7</td>
<td>24</td>
<td>240</td>
<td>3</td>
<td>100% 0%</td>
<td>0% 100%</td>
<td>70%</td>
</tr>
<tr>
<td>Design</td>
<td>2</td>
<td>4</td>
<td>5</td>
<td>30</td>
<td>1</td>
<td>100% 0%</td>
<td>0% 100%</td>
<td>70%</td>
</tr>
<tr>
<td>Delivery</td>
<td>1</td>
<td>3</td>
<td>90</td>
<td>360</td>
<td>12</td>
<td>100% 0%</td>
<td>0% 100%</td>
<td>70%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>3</td>
<td>7</td>
<td>119</td>
<td>630</td>
<td>16</td>
<td>100.00% 0%</td>
<td>0% 100%</td>
<td>85%</td>
</tr>
</tbody>
</table>

| Team 2 |      |       |            |             |               |                         |                       |                        |
|--------|------|-------|------------|-------------|----------------|-------------------------|-----------------------|                        |
|        |      |       |            |             |               |                         |                       |                        |
| Training | 3    | 7     | 24         | 240         | 3             | 0% 100%                 | 100% 0%                | 85%                    |
| Design  | 2    | 4     | 5          | 30          | 1             | 0% 100%                 | 100% 0%                | 85%                    |
| Delivery | 1    | 3     | 90         | 360         | 12            | 0% 100%                 | 100% 0%                | 85%                    |
| TOTAL   | 3    | 7     | 119        | 630         | 16            | 0% 100.00%              | 100.00% 0%             | 100%                   |

*Allows 8 business days between completion of first 15 courses and second offering of training session.*

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Appendix

- Section 508 Standards

- This link provides guidance for 508 programs
  https://section508.gov/sites/default/files/Technology%20Accessibility%20Playbook%20Version%201%20(last%20updated%206%202%20016%2029.doc

- Test Spreadsheet for Web Accessibility
  https://www.dhs.gov/sites/default/files/publications/Application_results_sheet_v4.0_0.xlsm