

July 8, 2004

MEMORANDUM TO: Record

FROM: Mark Van Winkle /RA/
Information Security Section
Division of Nuclear Security
Office of Nuclear Security and Incident Response

SUBJECT: INFORMATION SECURITY AWARENESS WEB-BASED TRAINING
COURSE AND SECTION 508 ACCESSIBILITY

The purpose of this memorandum is to document the Section 508 status of the Information Security Awareness Web-based Training Course under development by the Office of Nuclear Security and Incident Response (NSIR) and the intent to complete and field the course.

In 1998, Congress amended the Rehabilitation Act to require Federal agencies to make their electronic and information technology (IT) accessible to people with disabilities. Under Section 508 (29 U.S.C. 794d), agencies must give disabled employees access to information that is comparable to the access available to others. Since the Information Security Awareness Web-based Training Course under development by NSIR will be an electronic IT course, the NRC must comply with Section 508.

Mr. Lewis Clayman, Office of the Chief Information Officer, is NRC's Section 508 Coordinator and is one of those responsible for assessing IT projects at the NRC for Section 508 compliance. He has spoken with developers and reviewed plans for our course and determined that the course meets the intent of Section 508. However, there is one technical aspect of our course that could not be overcome. NRC guidance calls for the capability for web-based products which use Javascript, or other scripting format, to function "comparably" when the scripting is turned off by the user. In order for our web-based training to be hosted on the Technical Training Center's (TTC) Learning Management System (LMS) and in order to utilize the Sharable Content Object Reference Model capability to communicate with TTC's LMS, Javascript must be used.

Pursuant to 36CFR1194.3(e), which states, "This part shall not be construed to require a fundamental alteration in the nature of a product or its components," we conclude that the General Exception applies to the scripting necessary to meet the Sharable Content Object Reference Model capability discussed above, the altering of which would "require a fundamental alteration in the nature" of this product.

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Pursuant also to 36CFR1194.5, which states, "Nothing in this part is intended to prevent the use of designs or technologies as alternatives to those prescribed in this part provided they result in substantially equivalent or greater access to and use of a product for people with disabilities," we conclude that this constraint will not affect the ability of people with disabilities to access and use the course. Therefore, we intend to complete and field the course without this feature.

The point of contact for this matter is myself and I may be reached at 301-415-2209.

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