

# Texas Workforce Commission

A Member of Texas Workforce Solutions

Andres Alcantar, Chairman  
Commissioner Representing  
the Public

Ronald G. Congleton  
Commissioner Representing  
Labor

Hope Andrade  
Commissioner Representing  
Employers

Larry E. Temple  
Executive Director

May 26, 2015

Director of the Architectural and Transportation Barriers Compliance Board  
Office of Technical and Information Services  
Access Board  
1331 F Street NW, Suite 1000  
Washington, DC 20004-1111

**RE: Comments to the Architectural and Transportation Barriers Compliance Board Concerning Information and Communication Technology Standards and Guidelines under Section 508 of the Rehabilitation Act of 1973; Solicitation of Comments Published in the *Federal Register* on February 27, 2015 (Vol. 80, p. 10880); Docket Number ATBCB-2015-0002**

Dear Architectural and Transportation Barriers Compliance Board Director:

The Texas Workforce Commission (TWC) welcomes the opportunity to provide comments to the Architectural and Transportation Barriers Compliance Board (Access Board) regarding the proposed rulemaking concerning Information and Communication Technology (ICT) Standards and Guidelines under Section 508 of the Rehabilitation Act of 1973.

TWC supports the Access Board in its desire to "... replace the current product-based approach with requirements based on functionality, and, thereby, ensure that accessibility for people with disabilities keeps pace with advances in electronic and information technology."

TWC recognizes the Access Board's attempts to align with voluntary consensus standards that have been developed by standards organizations worldwide over the past decade, especially the Web Accessibility Initiative's Web Content Accessibility Guidelines (WCAG) 2.0. TWC anticipates that this alignment with international standards and guidelines will streamline our relationship with ICT vendors, including IT contractors that currently have to maintain competencies in the various local, state, and federal accessibility guidelines, as well as in any accessibility practices adopted by private industry.

TWC believes that these two changes—the functionality-based approach and alignment with WCAG 2.0—will help ensure accessibility in a rapidly evolving and dynamic ICT environment.

TWC believes that the delineation of covered electronic "content" will establish categories of non-public facing content that communicate agency official business, which must be accessible. We anticipate that this clarification will help us determine proper prioritization of efforts for accessibility of non-public facing electronic information and data, especially accessibility of internal documents.

Office of Technical and Information Services  
Page 2  
May 26, 2015

The current technical standards in Section 508 are outdated and confusing in light of the modern IT environment. TWC has already adopted WCAG 2.0 conformance level AA as its accessibility standard to ensure its ICT is accessible and usable for both employees and customers. However, it is important that Section 508 standards and guidelines be updated as quickly as possible. TWC believes these proposed rules are good—for our employees and customers and for accessibility in the larger IT industry.

TWC appreciates the Access Board's efforts to ensure that accessibility for individuals with disabilities keeps pace with advances in electronic and information technology.

Sincerely,

Andres Alcantar, Chairman  
Commissioner Representing the Public

Ronald G. Congleton  
Commissioner Representing Labor

Hope Andrade  
Commissioner Representing Employers

cc: Larry E. Temple, Executive Director, TWC