

NYSPSP

Digital Accessibility and Usability Testing and Remediation Reporting Services (DAUTRRS) Application

Procurement Council
September 13, 2018



NYSPSP

NYS PREFERRED SOURCE PROGRAM
FOR NEW YORKERS WHO ARE BLIND

Today's Speakers

- Carrie Laney, Executive Director, NYSPSP
- Albert Rizzi, Founder and CEO, My Blind Spot
- Colleen Franchini, Program Manager, Administration, NYSPSP

New York State Preferred Source Program for the Blind (NYSPSP)

- The New York State Preferred Source Program for New Yorkers who are Blind (NYSPSP) is a state-mandated initiative, first established in 1946, to create and sustain employment opportunities for New Yorkers who are blind or visually impaired.
- State and local agencies are required to purchase products and services on the Preferred Source List through NYSPSP. These commodities are produced by affiliated nonprofit agencies in New York employing people who are blind or visually impaired.



New York State Milestones

1913 – The New York State Commission for the Blind was established on April 30th.

1920 – The NYSCB offered its first sale of products made by persons who were blind.

1938 – President Roosevelt signs Wagner-O’Day Act, creating employment for people who are blind.

1944 – The NYSCB establishes the federal-state vocational rehabilitation program for persons who are blind.

1945 – New York became the first to enact a State-level program designed to give preference to products made by agencies employing the blind.

1946 – Industries for the Blind of NYS is formed in New York State.

1956 – 1960 – The NYSCB strengthens employment opportunities for persons who are blind, eliminates segregation, and integrates persons who are blind into the “normal” workforce and local communities.

1963 – The NYSCB assisted in writing legislation which clarifies the sale of products made by persons who are blind.

2012 – *OCFS/NYS Commission for the Blind* transfers the Preferred Source designation authority from IBNYS to NIB, resulting in the *creation of the NYSPSP*.

The NYSPSP Affiliate Members

Our Nonprofit affiliate members have offices and facilities all across New York.

- Brooklyn & Queens (Alphapointe)
- Manhattan (VISIONS & My Blind Spot)
- Long Island (My Blind Spot)
- Utica (CABVI)
- Binghamton (AVRE)
- Elmira (STAVI)
- Rochester (ABVI)
- Buffalo (Olmsted)
- Albany (NABA)
- Syracuse (Aurora & CABVI)



NYSPSP Authority and Program Structure



NYSPSP Services

- Prime on all product and service contracts
- Customer relations
- Sales & marketing functions - website and catalog creation and maintenance
- Submit and maintain product/service approvals with OGS
- A/R and A/P functions for all contracts
- Develop new labor opportunities for the agencies
- Liaison with NYSCB and OGS for program oversight and administration
- Advocate for compliance and program interests

Agency Deliverables

- Subcontracted by NYSPSP to fulfill customer product and service contracts
- Production, manufacturing, call centers
- Hire, train and employ people who are blind or visually impaired to carry out NYSPSP contracts
- Drop ship orders direct to customers
- Submit applications to NYSPSP for inclusions in the PSP
- Meet and maintain NYSPSP and NYSCB requirements regarding labor, wages, pricing, etc.

NYSPSP Functions

- **Contact Centers:** switchboard operations, order processing, customer service, and help desk support that exceed industry standard quality metrics with low turnover
- **Supply Chain Management:** warehousing, distribution, kitting, assembly, packaging, inventory and program management
- **Contract Closeout:** document preparation, imaging, and indexing
- **Administrative Support:** transcription, document conversion, digital imaging, data entry, mail and copy center operations
- **(Pending approval) Digital Accessibility and Usability Testing and Remediation Reporting Services (DAUTRRS):** comprehensive accessibility analysis, automated and manual accessibility testing, reporting of recommended remediation, best practice development, training materials development, accessibility and usability consulting, and personalized and codified knowledge transfer and service support



Employment for New Yorkers who are Blind

- NYSPSP's affiliate members providing DAUTRRS will utilize a direct blind labor ratio of at least 75%. The number of hours for each service agreement will vary by contract/project.
- Potential for the addition of 2.7 full time employees (~2 blind or visually impaired full-time employees at 75% of 2.7 FTE's) based on potential engagements with anticipated staff additions based on year over year growth as DAUTRRS matures as a Preferred Source Offering.
- My Blind Spot (MBS) is a founding member of the International Association of Accessibility Professionals and many of their staff are IAAP Certified Professionals in Accessibility Core Competencies (CPACC) and Web Accessibility Specialists (WAS).
- The CPACC and WAS IAAP credentials certify professionals as experts in accessibility, usability, technical knowledge, laws, and management strategies.
- DAUTRRS is an opportunity for the blind and visually impaired to use their innate abilities, assistive technologies, and create avenues of gainful employment across New York State.
- Committed to the development of the common testing approach for accessibility compliance and conformity, Trusted Tester (TT) provides a code-inspection based test approach for determining software and website conformance to the Section 508 standards. . [Department of Homeland Security Trusted Tester Program \(TT\)](#)

Reasons to Hire People with Disabilities

- Access to untapped pool of talented professionals.
- People with disabilities have equal or higher job performance ratings, higher retention rates and lower absenteeism.
- People with disabilities are better educated than ever, proving to have met and/or exceed increasing challenges.
- A person with a disability motivates work groups and increases productivity.
- People with disabilities are motivated by the desire to give something back, opportunities for personal growth, job flexibility and social inclusion.
- Employees with disabilities can relate better to constituents with disabilities, who represent \$1 trillion in annual aggregate consumer spending.
- Employing people with disabilities is good for the individual, the business, and society. "Win-win-win" strategy.
- Accessible work environments facilitate remote work opportunities, increasing a work force with disabilities beyond the city and into rural communities.



“It’s ability, not disability that counts.”
My Blind Spot, Inc.

What is Digital Accessibility and Usability Testing and Remediation Reporting Services (DAUTRRS)

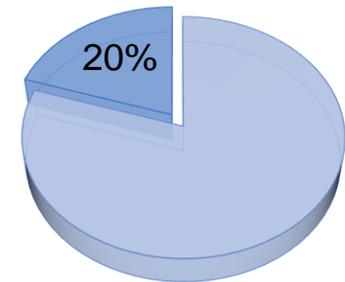
An **evaluation** of a customer's digital platforms to allow people who are blind or visually impaired to access digitized communications and information.



Human Impact

- Over 57 Million Americans live with a disability - more than the populations of California and New York combined.
- **People with disabilities are nearly 20% of the US population.**
- New York has 19,862,512 people - The 4th most populous state in the country.
- **According to the New York Department of Health, nearly one in five New Yorkers (nearly 4 million people) have a disability due to an impairment or health condition.**
- Approximately half a million New York residents have a visual disability (American Community Survey, 2015)
- **Due to the increasing aging population and degenerative diseases like diabetes and macular degeneration, millions more New Yorkers will acquire a print disability.**

US POPULATION



¹A person with a print disability is "An individual who cannot effectively read print because of a visual, physical, perceptual, developmental, cognitive, or learning disability".

DAUTRRS Delivers

Tax e-filing

- Digitally designed solutions ensuring compliance with accessibility and usability regulations and standards.
- Digital assessments, testing, and reporting of recommended remediation suggestions through Corrective Action Plans (CAP).
- Personalized and codified knowledge transfer & service support

Online Voter Registration



Online Vehicle Registration

Example Platforms

Why Digital Inclusion is Necessary

Governor Cuomo's Employment First Initiative, Executive Order 136, is tasked with establishing policies and practices for government, community agencies and advocacy organizations to:

- Increase the employment rate of New Yorkers with disabilities
- Create remote work-from-home opportunities for New Yorkers with disabilities lacking access to dependable public transportation
- Decrease the poverty rate of New Yorkers with disabilities
- Encourage businesses to establish formal policies to hire people with disabilities

New York State Accessibility and Usability Laws and Policies

New York State Accessibility and Usability Laws and Policies

- New York State established its first web accessibility policy in September of 1999.
- This first policy was aligned with the World Wide Web Consortium Web Accessibility Initiative's, known today as the WCAG.
- In 2004, melding the WCAG and 508 standards together, New York State developed a hybrid accessibility standard covering all agencies and contractors doing business with the Federal Government.
- Under federal and state law, it is illegal to discriminate against any person with an actual or perceived disability for public accommodations, employment, voting, education, and within state or federal digital environments.
- Statewide Technology Policy P08-005 (Effective Date: August 1, 2008)
- The latest version of [New York State accessibility laws and standards](#) was adopted in 2010. It includes 508 subsections 1194.22 as it corresponds with [WCAG](#) and subsection 11943.1.

Inclusive Digital Design – Benchmarks & Standards

Providing accessible and usable barrier-free digital platforms is mandated under Federal Law and State Policy, specifically:

- Titles II and III of the Americans with Disabilities Act of 1990
- Sections 508, 504 and 503 of the [Rehabilitation Act of 1973](#)
- International Organization for Standardization (ISO) [ISO/IEC 40500:2012](#)
- Best practices and protocols as outlined by the [Worldwide Consortium for Accessibility Governance \(WCAG\)](#)

Accessibility vs. Usability

Manual testing with Assistive Technology (AT) users is the only way to determine if digital platforms are accessible and usable to all end users.

If an image contains a Meta tag of “image”, it will pass all automated accessibility tests, qualifying it as accessible and compliant.

Appropriately descriptive tags convey information about the image and hyperlink if it’s a linked image.

A proper description of a linked image of an envelope would be: “image of envelope – click here for your messages”.

Providing the best accessible user experience is achieved by adopting best practices for digital design and development as outlined by [WCAG 2.1 AA standards](#).



Examples of Inaccessible Digitized Communications and Information

- An agency wishes to collect feedback on community program changes or a citizen is attempting to submit an online form, but people using an assistive device cannot complete the form fields requesting information because they are not coded properly.
- When county websites do not allow users to zoom in and magnify text on the screen, citizen's with low vision cannot read their property tax record on their iPad.
- Videos are posted on public facing websites, but do not include captioning, transcripts, audio description, and or end users are unable to independently control the video using assistive technologies.



Assistive Technologies and the People Who Use Them

People with different disabilities access the Internet in different ways, and they face different obstacles impacting their access to web content, communications, and information. Some use assistive technologies such as screen readers, and some use a keyboard without a mouse to navigate.

The Spectrum of Ability

- Visual
- Auditory
- Motor
- Cognitive

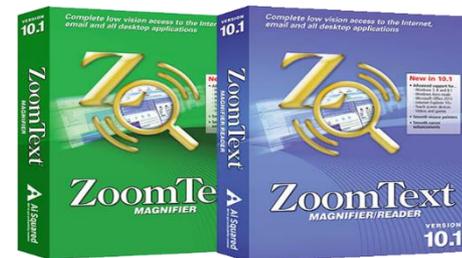
Assistive Technology

Screen Readers & Screen Magnifiers

Screen readers are software programs that allow blind or visually impaired users to read the text that is displayed on the computer screen by transcribing text into an audio output with a speech synthesizer or braille display. In short, screen readers allow a person who is totally blind to navigate a website or software program as adeptly as someone with full sight.



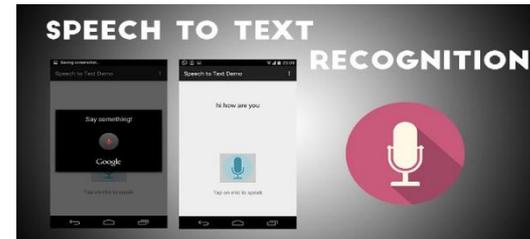
A screen magnifier is a software program that interfaces with a computer's graphical output to present enlarged screen content. It is a type of assistive technology suitable for visually impaired people who are legally blind but may have some functional vision or loss of visual acuity.



Assistive Technology

Speech-to-Text Technology & Refreshable Braille Displays

Voice prompt programs that allow people with a mobility impairment, learning disability or limited keyboarding skills to consume digitized communications and information by dictating or listening to an audio output because reading text on the screen or using a keyboard is difficult or not at all possible.



A braille display can show up to 80 characters from the screen and when refreshed, changes continuously as the user moves the cursor around on the screen.



DAUTRRS Value Adds



- **Reduced risk to litigation**, citations for various lawsuits leveled against county seats and states attached as an addendum to application.
- **Digital inclusive work environments open pathways** to employment for blind and print disabled New Yorkers.
- Decreasing the **70% unemployment** and under employment rates amongst blind and visually impaired residents.
- **Decreased demands on state entitlement programs** and increased tax revenue with digitally inclusive work environments.
- Social capital realized through digital inclusion of the nearly **5M residents with a disability**.
- Improved **access to digitized communications and information** to best ensure an informed electorate.
- **Ensure equal access to education for students and parents** relying on digitized information for tracking progress in elementary, secondary and post-secondary educational institutions.

The DAUTRRS Deliverable – A Corrective Action Plan (CAP)

The assessment and review of accessibility, usability and functionality of Digital platforms serve as the input for the development of a Corrective Action Plan (CAP), outlining digital solutions necessary to achieve compliance.

Final CAP documents include all accessibility violations and remediation suggestions to be implemented, with subsequent guidance, knowledge transfer and instructions available to support the accessibility remediation effort.

DAUTRRS teams are available to guide clients through proper remediation implementations to achieve full compliance with all mandates, regulations and best practices governing digital inclusion.

How are Accessibility and Usability Testing Services Performed (The DAUTRRS Process)?

- Combination of automated and manual testing procedures.
- Automated software is capable of capturing approximately 30% of accessibility errors or violations.
- **Manual testing comprises 70% of DAUTRRS testing process.**
- **Manual testing is performed by highly qualified Subject Matter experts, assistive technology users and My Blind Spot employees with disabilities**
- Corrective Action Plan (CAP) is provided at the end of evaluation and testing, delivered prior to customer's implementation.
- Timeframes for testing and reporting vary depending on project scope and complexity. (Examples of CAP reports are included in the application)

How are Accessibility and Usability Testing Services Performed (The DAUTRRS Process)? Continued...

On desktop and mobile device operating systems, blind and print-disabled usability testers manually evaluate if all components of a webpage are navigable, readable, operable, accessible, and usable.

Testers use screen readers, screen magnifiers and braille display software to test website and mobile app content

Representative subsets of high-traffic pages are tested in lieu of all pages in instances of extreme numbers of unique pages.

The assessment includes but is not limited to:

- All navigation tables, links, buttons, headings, tables, website regions, and navigation structures feature accurate labels and are usable.
- Ensuring all interactive elements are usable and labeled according to function, such as check boxes, radial buttons, drop down boxes, and form fields.
- Checking all images, graphics, and pictures for functional alternative text attributes.

Market Comparisons - Prevailing Market Research

- Competitively awarded DAUTRRS contracts to commercial vendors included projects awarded to private sector corporations domiciled outside of New York, had engaged with State agencies including the DMV and educational institutions, including Community Colleges and state universities.
- We have included two contracts in our application for competitively awarded DAUTRRS contracts to commercial vendors by NYS Community Colleges.
- Most of the firms performing WCAG 2.0 AA and 508 work complying with the standards and regulations are out of state and sometimes out of the country.

The DAUTRRS initiative will keep business in our state performed by New Yorkers who are blind.



Hourly Billable Rate: \$150

NYS Small Business Impact

In addition to positively impacting the state's economy, MBS and NYSPSP also see tremendous opportunity for partnering with vendors, consultants and contractors already working with state agencies in the delivery of digital platforms- **as partners, and not as competitors.**

My Blind Spot has partnered with other Preferred Source Vendors, such as the Viscardi Center, an affiliate member of NYSID



Past DAUTRRS Performances

NYS Departments/ Agencies

- DMV
- NYS ITS
- **SUNY** (contract pending)

Government agencies, corporations and community-based organizations

- Cablevision
- Fresh Direct
- **JP Morgan Chase**
- Reader's Digest Partners for Sight
- Suffolk County, NY

National and International Clients

- **American Airlines**
- Bill.com
- Cablevision
- Canon USA
- Carnival Cruise Lines
- Intuit
- Lake Trust Federal Credit Union
- Landry's Select Club
- Louisiana State University
- Microsoft
- Pea Pod
- Royal Jordanian Airlines
- Securian Financial
- Stop and Shop
- Toyota/Lexus
- World Education Service



A full listing of My Blind Spot's clients, with references, is included as an *addendum* to the NYSPSP application.

DAUTRRS Support



Office of Information Technology Services

Letter to RaAnn Destito
September 4, 2018
Page 7 of 9

residents, including members of the blind and print disabled communities. NYSPSP and MBS employ people who are blind or print disabled, stakeholders reliant on assistive technology with a vested interest and expertise in ensuring accessible, usable, functional, digital platforms. These individuals are New Yorkers themselves, and serve as the best qualified individuals to assess, remedy, and correct unintentional problems imposed by digital barriers.

MBS and NYSPSP have success and local agencies under the same services to the digital in State. The NYSPSP and MBS a natural component to MBS and will undoubtedly assist in progress. Additionally, this of of inclusiveness by helping use of digitalized platforms, of

This letter is to convey ITS' or Services application.

RHS/zi

8/29/2018

Letter to RaAnn Destito
September 4, 2018
Page 7 of 9

for visually impaired New Yorkers. While in use by many commercial providers, these tools have been found to be inadequate to meet the needs of ITS.

To compensate for this lack of automated usability testing, ITS employs services to provide for

in-person accessibility testing and guidance. These services are currently by commercial providers, and are often procured on a discretionary basis or in procurement as part of a specific accessibility testing and delivery. While these commercial providers for their attempts to provide meaningful these services have not proven to be effective in providing adequate to assist those service providers lack the real-world experience of having been denied experience

Long-Term Cost Savings

Application and website development is a time-consuming manual process high level of expertise and technical knowledge. Low-cost, complicated, desktop mechanical applications are built to perform a series of well-considered tasks with other applications is achieving their goal of providing efficient access. Because of this complexity, having usability functionality built into application development is not only the right thing to do for visually impaired New Yorkers, effective way to ensure application usability.

Once an application has been developed, the onboarding of expertise on its vendors to deconstruct, build upon, or patch together usability solutions of application efficiency, effectiveness, and consumably more resources & features later integrated at the time of initial application development. Many Yorkers who depend on these systems to deliver critical government services these solutions to be implemented.

In addition to assistance provided during the development and testing phase based knowledge transfer services provided for in this application are vital success of accessibility projects, while at the same time allowing for future providing the state workforce with the knowledge and skills to understand accessibility requirements in-house.

ITS Recommendation

The NYSPSP is submitting a Preferred Source application for the addition of accessibility governance services to build and strengthen New York State's (for the reasons articulated above), ITS strongly supports this application and the Procurement Council members support this application as well.

Through its partnership with My Blind Spot ("MBS"), the NYSPSP partner in NYSPSP will work to advance equal access to public facility (digital) data related education, information, recreation, and independent living opportunities to

Division of State Finance, P.O. Box 2025, Albany, NY 12220 | info@nysp.org



ANDREW M. CUOMO
Governor

ROBERT H. BARNSON
Chief Information Officer

September 4, 2018

Commissioner RaAnn Destito
Office of General Services (OGS)
Corning Tower, 41st Floor
Empire State Plaza
Albany, NY 12242

Re: NYSPSP's Digital Accessibility and Usability Testing Services Preferred Source Application

Dear Commissioner Destito,

As the Chief Information Officer ("CIO") of the New York State Office of Information Technology Services ("ITS"), offer this letter of support on behalf of the application from the New York State Preferred Source Program for People Who Are Blind ("NYSPSP") for *Digital Accessibility and Usability Testing Services*.

As you know, the State must comply with a myriad of laws, rules and regulations ensuring accessibility to those citizens with visual impairment, including Titles II and III of the Americans with Disabilities Act ("ADA") and Sections 508, 504, and 503 of the Rehabilitation Act, and further supported under Governor Andrew M. Cuomo's Employment First Initiative, created through Executive Order 136. ITS, on behalf of client agencies it serves, takes this responsibility very seriously.

Inadequate Tools and Services Currently Available

As a practical matter, the unprecedented rise and dependency on digitized information and communications has resulted in numerous beneficial changes at work, school, and in life. Yet for millions of New Yorkers, these digital changes have created barriers to the ability of visually impaired individuals to interacting with the State – a reality which ITS finds unacceptable. To ensure that the State maximizes the accessibility and usability of digital information and communication for all citizens, ITS must be provided with the necessary services to accomplish this goal.

Many software tools currently available are generally structured to provide the user with basic understanding of accessibility. These tools produce basic reports outlining areas for improving accessibility, but provide few details and no guidance to implement any true form of usability

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What is Outside of DAUTRRS Scope?

- Web design (Creation of new websites)
- IT/ website programming
- Accessing the government website and directly performing the remediation
- IT Help Desk Services
- **Standalone and one-off classroom trainings**





AMERICA'S WORKFORCE:

EMPOWERING ALL

National Disability Employment Awareness Month



OFFICE OF DISABILITY EMPLOYMENT POLICY
UNITED STATES DEPARTMENT OF LABOR

#NDEAM | [dol.gov/odep](https://www.dol.gov/odep/)

October is National Disability Employment Awareness Month

#NDEAM

<https://www.dol.gov/odep/>

The power of the Web is in its universality. Access by everyone regardless of disability is an essential aspect. - Tim Berners-Lee, W3C Director and inventor of the world wide web

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