



## U.S. Merit Systems Protection Board 2021 Merit Principles Survey Documentation of Review for Accessibility

Section 508 of the Rehabilitation Act (29 U.S.C. § 794d), as amended by the Workforce Investment Act of 1998 (P.L. 105-220), requires that Federal agencies to acquire and use information and communications technology (ICT) that is accessible to people with disabilities. Accordingly, MSPB designed the planned 2021 Merit Principles Survey (MPS) with accessibility in mind, and has reviewed the survey (which will be administered online) to evaluate its accessibility and identify any remediation necessary. This review was conducted in December 2020 by the MSPB’s Office of the Clerk of the Board.

The following document summarizes MSPB’s review of the 2021 MPS, which will be administered electronically. The document—

- Lists the elements and features reviewed for accessibility;
- Summarizes the conclusions of the expert reviewer; and
- States that the survey is sufficiently acceptable (“508(a)-compliant”) as implemented.

There may be minor differences between the text of the version reviewed for accessibility and the version that will be fielded. Those differences will be limited to modifications of wording or punctuation or deletion of survey questions or response choices. The fielded version will **not** contain any new question types or modifications to page navigation or elements.

Questions about the survey or its accessibility may be emailed to [MPS2021@mspb.gov](mailto:MPS2021@mspb.gov) or directed to contacts provided on MSPB’s website, [www.mspb.gov](http://www.mspb.gov).



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Accessibility testing for the 2021 Merit Principles Survey was conducted using the Accessibility Community of Practice recommendations, as well as the Interagency Trusted Tester Program approach.

Testing was conducted in multiple environments with a variety of tools.

- Operating System:
  - Windows 7
  - Windows 10
- Browsers:
  - Google Chrome, v. 87
  - Microsoft Internet Explorer, v. 11
- Tools:
  - Accessible Name & Description Inspector (ANDI), developed by the Social Security Administration
  - Color Contrast Analyzer (CCA), a free open-source tool developed by Steve Faulner and the Paciello Group
  - JAWS Screen Reader, v. 2020.2008.24 ILM
  - Narrator (built-in screen reading capabilities within Windows 10)

Testing was conducted under the ITTP recommended testing baseline against Web Accessibility Content Guidelines (WCAG) 2.0. A total of 23 baseline tests were performed over the course of several days and iterations, with four being not applicable to the survey (relating to audio, video, and synchronized media).

Baseline testing included the following topic areas:

- Keyboard navigation
- Focus (visible, order, and hidden content)
- Skip-navigation links
- Multi-state components
- Images
- Color (meaning and contrast)
- Flashing
- Forms
- Page Titles
- Data Tables (headers and cell-header mapping)
- Headings

- Links and user controls
- Language
- Style-sheet non-dependence
- Frames
- Alternate pages
- Time outs
- Image maps
- Plug-in links

The overarching result from extensive testing was that the 2021 Merit Principles Survey **is accessible and compliant with Section 508 requirements**. Testing performed by the MSPB Accessibility Program Manager revealed no major issues related to the survey, navigation, or the ultimate use of common accessibility-related software for users with those needs.

The only issues noted during testing were resolved with an update to JAWS to the most recent version as listed above. This occurred under Windows 7 and while using Chrome, but did not consistently occur even when the screen reading software failed to properly describe the pages/items in question.

Testing occurred over multiple iterations of the survey, with the final version tested being found to be compliant based on testing of the baseline Web-related items above. Baseline testing was limited to the tools and software listed earlier in this summary, and use of other versions or alternate software may result in a different result for a particular user.