



Homeland
Security

Privacy Office, Mail Stop 0655

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MEMORANDUM FOR: DHS FOIA Officers

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SUBJECT: Creating 508-Compliant PDF Documents

This guide provides instructions for converting a redacted document into a Section 508 Compliant¹ Adobe PDF. The Privacy Office follows the National Security Agency (NSA)'s recommended procedure for redacting documents.² This process renders document content inaccessible to 508-required assistive technology because the document is converted into a print image. Although general guidance and sample information is provided in this guide for reference, organizations are encouraged to obtain Section 508/accessibility training, offered by DHS or their organization. Follow the process below in order to make a print image 508-compliant after the document has been properly redacted.

To make the document Section 508 compliant, perform the following steps:

¹ In 1998, Congress amended the Rehabilitation Act to require Federal agencies to make their electronic and information technology accessible to people with disabilities. Inaccessible technology interferes with an individual's ability to obtain and use information quickly and easily. Section 508 was enacted to eliminate barriers in information technology, to make available new opportunities for people with disabilities, and to encourage development of technologies that will help achieve these goals. The law applies to all Federal agencies when they develop, procure, maintain, or use electronic and information technology. Under Section 508 (29 U.S.C. § 794d), agencies must give disabled employees and members of the public access to information that is comparable to the access available to others.

² "Redacting with Confidence: How to Safely Publish Sanitized Reports Converted from Word 2007 to PDF," dated March 18, 2008; "Redacting with Confidence: How to Safely Publish Sanitized Reports Converted from Word to PDF," dated February 2, 2006; and, Chief FOIA Officer and Chief Security Officer's joint memorandum, Redacting Sensitive Information, May 5, 2010.

1. Converting a Redacted Document into a Section 508 Compliant PDF

Before a PDF can be considered 508 accessible, it must contain an actual text content layer, be properly tagged, have a logical reading order, images must be accompanied with alternative text, and the document must have a specified language.

2. Creating Accessible Content in a Redacted Document

Printing a document as an image renders the textual content of the document inaccessible to assistive technology, such as screen readers, and alternative devices. Because the redacted information is completely removed when performing the NSA's recommended redaction process, only content that should be accessed by the public is made available when the document is scanned using the Optical Character Recognition (OCR) function. To make the content 508 accessible, OCR must be performed.

3. TO OCR a document:

- a. From Acrobat's main menu select **Document>OCR Text Recognition>Recognize Text using OCR**.
- b. When the Text Recognition box appears, select **Edit** to modify the OCR settings.
- c. Select the desired Primary OCR language.
- d. Change the PDF's Out Put Style to **Clear Scan**.
- e. Set the Downsample Images to Lowest (600 dpi).

Figure 1: Example of Recognize Text Settings



4. Adding Tags to the Document

Once OCR has been performed, the document must be tagged. Adding tags to a document establishes the document's structure and creates a reading order. To quickly tag a document from Acrobat's main menu select **Advanced>Accessibility>Add Tags to Document**.

5. Adjusting Reading Order

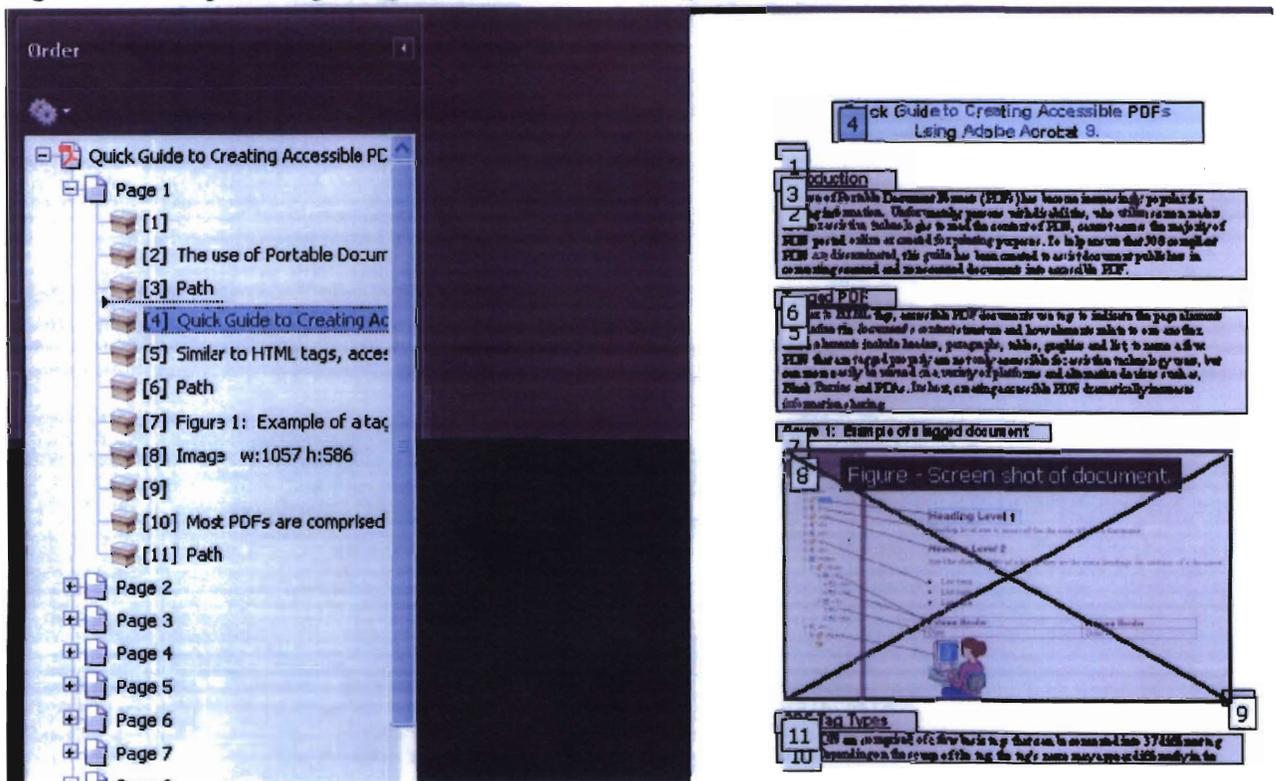
The reading order determines the order a screen reader reads document elements. In some cases the Physical View, which is the print view, and the Content View, which is

the reading order are not synchronized, therefore; the reading order needs to be adjusted to match the physical view.

6. To adjust the reading order:

- a. From Acrobat's main menu, select **View>Navigation Panel>Order**. Once the **Order Panel** is displayed, numbers will appear on the document, revealing the document's reading order.
- b. Identify the first element that is out of place and in the **Order Panel** click on the box to the left of the element and drag the element to the proper location. Continue this process until all elements are in the proper reading order. If all elements are in the correct order, no adjustments are necessary.

Figure 2: Example of adjusting the document's reading order



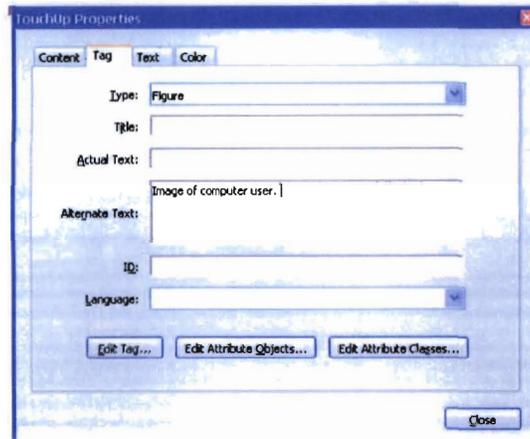
7. Adding Alternative Text

Alternative text is used to convey the purpose of images or objects embedded in documents. Without alternative text, valuable information is lost, and the document may not be completely understood by users accessing the document with assistive technology or alternative devices.

8. To add alternative text to redacted sections of the document and all images that conveys information:

- a. From Acrobat's main menu, select **View>Navigation Panel>Tags**.
- b. Expand the Tag's tree and locate the first **<Figure>** tag.
- c. Right click on the desired tag in the tags tree and select **Properties**.
- d. Go to the **Alternative Text** field located on the **Touchup Properties** window and add the appropriate alternative text. Alternative text for redacted text should be "Redacted text".
- e. Place cursor outside of **Alternative Text** box and close the window. Once the document is saved, the alternative text will be applied.

Figure 3: Example of adding alternative text to a Figure tag



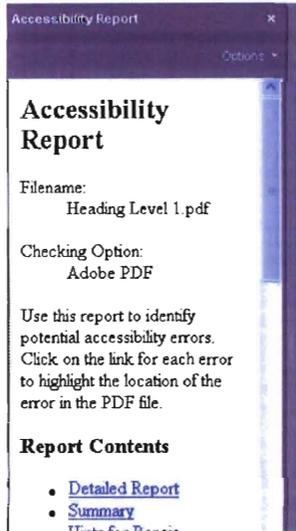
9. Test Document for Section 508 Compliance

- a. To access Adobe's Accessibility Full Check:
- b. Select **Advanced >Accessibility>Full Check**
- c. Select the **Select All** button to check all the check boxes. This will ensure that the PDF is tested for full accessibility.
- d. Select **Start Checking** button.

If the Accessibility Full Checker finds any errors, an **Accessibility Report**, that provides suggestions for repairing the document, will appear on the screen. If additional help is needed, Press the **F1** key to launch **Adobe Help Viewer**.

Caution: The Accessibility Full Checker will not verify that the reading is correct. Use a screen reader to test the reading order.

Figure 4: Example of Adobe's Accessibility Report



Heading Level 1

Heading level one is reserved for the main title of a document

Heading Level 2

Are like chapter titles of a book, they are the main headings for sec

- List item
- List item
- List item

Column Header	Column Header
Data	Data



10. Adobe's Read Out Loud Screen reader

- From the View menu select **Read Out Loud**<Activate Read Out Loud.
- Select **View>Read Out Loud>Start**.