



August 31, 2024

U.S. Access Board
1331 F Street NW, Suite 1000
Washington, DC 20004-1111

RE: Artificial Intelligence (AI) for the disability community and AI practitioners: Submitted via email

Dear Executive Director Pavithran,

On behalf of the Association of Assistive Technology Act Programs (ATAP), we are pleased to submit recommendations to inform the Access Board's work focused on artificial intelligence (AI). To support your work, we recommend the following:

1. Federal agencies must meet Sec. 508 Accessibility Standards to develop accessible, interoperable AI-supported programs for all formats (online/digital, websites, mobile applications and information and communication technology (ICT) to be compatible with assistive technology (AT).
2. Federal agencies must include people with disabilities in AI initiatives to safeguard against the negative impacts of bias and to build accessible AI-supported programs that serve the disabled.
3. Federal agencies must contract for technical assistance to create accessible and interoperable AI.

Federally funded programs that utilize AI must be accessible, usable, and interoperable with AT. To responsibly develop AI-supported programs, people with disabilities must be included in the development, design and implementation of new or updated programs and information. Additionally, to ensure interoperability with AT, all agencies must plan now to fund and provide technical assistance to public entities. For example, an agency could jointly fund grants with and through existing federal agency TA centers that would allow partners, such as the AT Act Programs -which have the expertise and knowledge to help state and local public entities test new AI-supported information/programs for accessibility, functionality, and interoperability with AT. Millions of Americans have visual, auditory, physical, speech, cognitive, and neurological disabilities that impact their ability to use the web, software, smart phones, and other ICT. Ensuring that programs utilizing AI are accessible and interoperable with AT on every platform and format is essential for these Americans to learn, work, and live independently.

ATAP appreciates the opportunity to comment. Please let me know if we can provide any additional information. I can be reached at (202) 344-5674 or audrey.busch@ataporg.org.

Sincerely,

A handwritten signature in cursive script that reads "Audrey Busch".

Audrey Busch
Executive Director
Association of Assistive Technology Act Programs (ATAP)

ATAP represents State and Territory Assistive Technology Act Programs formula funded under Section 4 of the Assistive Technology (AT) Act. State and Territory AT Act Programs operate in all 50 states, the District of Columbia, Puerto Rico and four territories and are available for persons with all types of disabilities, all ages, in all environments (education, employment, community living, , and information technology). State and Territory AT Act Programs are able to best match the proper assistive technology (AT) with individuals' needs, provide a device demonstration, loan a device, and provide training and support for the use of the device. Assistive technology and/or adaptive

equipment can facilitate, support, and improve functionality so every individual with disability can obtain an education, gain, and maintain employment, and live independently in their community.