



California State University, Chico

**Accessible Technology Initiative
Accessible Electronic & Information
Technology Procurement Plan
Second Year Report 2008**

In compliance with the Americans with Disabilities Act of 1990 (ADA), Section 508 of the 1973 Rehabilitation Act (as amended in 1998), the California State University Coded Memorandum AA-2007-04 requires annual reporting for implementation of the Accessible Technology Initiative. This report focuses on Priority Three: Accessible Electronic and Information Technology (E&IT) Procurement, due August 15, 2008.

The topics identified in this document address CSU Chico's original plan from 2007 and provide a narrative description of Chico's progress as well as obstacles in achieving our goals. This report provides updates to Chico's original plan, reports on significant tasks that were completed; what Chico expects to accomplish next year; areas of difficulty and barriers to completion; and observations and discoveries.

1. Have you refined or changed your procedures from those you described in your 2007 plan? If so, please explain.

Accomplishments in 2007-2008:

- ✓ CSU, Chico has not made any significant changes to our original procedures as described in the 2007 plan.
- ✓ Identification of ATI products has been ongoing in the procurement office.
- ✓ Language for ATI procurements is included at biddable levels (\$50,000)

Plans for 2008-2009:

- Continue refinement of overall procurement plan
- CSU, Chico will revise the Information Technology Procurement Review process, required for IT requests \$10K and over, to include ATI review for applicability and compliance.
- Continue with form development and refinement for procurement policies and procedures.
- Provide related ATI and procurement deliverables

Barriers to completion:

- Time constraints training end users (requestors)
- CSU, Chico had very few E & IT procurements over \$50,000 making the use of forms and procedures rare.

Observations/discoveries:

We feel that including the ATI compliance review with our standard IT Procurement review will streamline the process and be less confusing to the end users.

2. Please describe briefly the team involved in your 508 procurement process, and the roles and responsibilities of team members, especially if they have changed since you submitted your plan. If you have had trouble identifying team members, please explain why and include your suggestions of solutions at the campus or Chancellor's Office level.

Accomplishments in 2007-2008:

- ✓ The team has monthly meetings to track progress
- ✓ Roles & Responsibilities for 508 Procurement Process Team
- **Requestor** – the individual requesting the acquisition of an E&IT product or service
 - Develops functional requirements for the requested products or services, with the assistance of campus technical staff as necessary
 - Conducts market research to identify sources that meet the functional requirements
 - Determines which accessibility subcategories are applicable for the product
 - Evaluates the vendor responses to Section 508 compliance
 - Verifies Section 508 compliance information submitted

- Provides Section 508 documentation for the acquisition file
 - Obtains Section 508 Compliance Officer review and approval (if necessary) of Section 508 compliance determination
 - Provides the acquisition request along with the approved Section 508 documentation to the Buyer
 - Creates accurate and supportable functional requirements
 - Participates in formal competition acquisitions by providing necessary information to develop formal solicitation documents that include criteria to evaluate product conformance and evaluation of the proposals
- **Section 508 Compliance Officer** (position not currently filled on campus); CIO and/or HR – Duties currently being performed by Director of Procurement & Director of Computing & User Services
- Assists staff, faculty, student, the public and other outside sources with Section 508 issues or questions
 - Assists Requestor in the review of E&IT Section 508 compliance documentation
 - Evaluates and in some instances approves exemption requests
 - Creates comprehensive ATI Section 508 program
 - Promotes the importance of Section 508 efforts
 - Oversees Section 508 training and communications
 - Assists with the resolution of non-conformant procurements and contractor product problem and works to create win-win solutions
 - Ensures consistent implementation of Section 508 programs
 - Acts as liaison on Section 508 matters with management
 - Works with EEO and Disability Support Services on issues, especially E&IT reasonable accommodation problems
 - Works with relevant offices to address accessibility issues for students, employees and members of the public
- **Procurement & Contract Services Buyer** – Individual responsible for actual procurement of the E&IT product or service.
- Responsible for reviewing the ATI documentation to verify that proper approval has been obtained, including proper documentation submitted and included in the procurement file:
 - Processes properly documented E&IT acquisition requests
 - Considers only vendors for the acquisition who have complied with Section 508 documentation requirements
 - Purchases product per the market research and according to CSU policies and procedures
 - Ensures that Section 508 requirements are contained in contracts awarded
- **Computing & User Support Director** or designee
- Assists Requestors with functional requirements and market research
 - Provides interface between Section 508 requirements and technical specifications
 - Perform in a general capacity strategic planning of E&IT requirements
 - Assists Requestors with evaluating vendor Section 508 documentation
 - Evaluates products with the CIO and/or Section 508 Compliance Officer to determine the technical credibility of an exemption
 - Works with the Buyer on technical questions and issues during the E&IT acquisition process

- Participates, as the Section 508 technical representative, in strategic planning of campus E&IT requirements (e.g., software development, training)
- Participates as the technical source in the resolution of accessibility issues of students, faculty, staff and the public
- Advises Section 508 Compliance Officer on technical matters as they relate to accessibility issues

Plans for 2008-2009:

- Highlighted sections within the “Requestor” will be implemented this year
- 508 Compliance Officer position will be reviewed for funding this year. These duties will continue to be performed by the Director of Procurement & Director of Computing and User Services
- Exceed ATI procurement deliverables due to implementation of \$10,000 limit

Barriers to completion:

- Funding for 508 Compliance Officer
- CSU, Chico had very few E & IT procurements over \$50,000 making the use of forms and procedures rare
- Retirement of Director of Procurement

Observations/discoveries:

The retirement and ultimate hiring of a new Director of Procurement & Contract services has presented some challenges for continuity of processes and information for the procurement plan.

3. Please list the other significant roles of individuals involved in the 508 procurement process. Please briefly list the 508 procurement responsibilities of each.

Accomplishments in 2007-2008:

- ✓ IT & Buyers have had to work collaboratively for 508 review and compliance

Plans for 2008-2009:

- Work with requestors to help them to be a part of 508 identification and ultimate compliance
- Provide related ATI and procurement deliverables

Barriers to completion:

- Time constraints training end users (requestors)
- Lack of funding for 508 compliance officer

Observations/discoveries:

CSU, Chico is currently upgrading the financial module for PeopleSoft and a significant amount of staffing time within the Procurement Office is involved with the upgrade.

4. How many procurements over \$50,000 were made on the campus? Were you able to incorporate Section 508 requirements in all of them? If not, why not?

Accomplishments in 2007-2008:

- ✓ Two significant proposals were created in 2007-2008 that required inclusion of 508 requirements

Plans for 2008-2009:

- Include Section 508 requirements at \$10,000 level
- Provide related ATI and procurement deliverables

Barriers to completion:

- CSU, Chico had very few E & IT procurements over \$50,000 making the use of forms and procedures rare

Observations/discoveries:

Due to campus end users (requestors) lack of awareness of Section 508 requirements, the Procurement & IT staff were required to evaluate for 508 compliance. As the campus community becomes more aware of Section 508 requirements through training and form issuance, we expect more information to be provided by the requestor.

5. Of the procurements that did incorporate Section 508 requirements, how many resulted in an exception from the 508 requirements? Which exceptions have been used? Please provide an example or two, if you have any.

Accomplishments in 2007-2008:

- ✓ None of the procurements over \$50,000 resulted in an exception

Plans for 2008-2009:

- Include Section 508 requirements at \$10,000 level
- Provide related ATI and procurement deliverables

Barriers to completion:

- None

Observations/discoveries:

CSU, Chico had very few E & IT procurements that were over \$50,000 making the exception process unused thus far. With the lower dollar threshold it is more likely that an exception may be requested. Training and forms issuance should help guide and inform the requestor through the process.

6. If there were exceptions, how many included a procedure to provide equally effective alternative access? Please attach one as an example.

Accomplishments in 2007-2008:

- ✓ CSU Chico had no exceptions

Plans for 2008-2009:

- Test exception form and procedure if exception is requested

Barriers to completion:

N/A

Observations/discoveries:

Without the funding for 508 Compliance Officer it will take time for the campus community to be trained on exceptions

7. What 508 procurement communication activities took place during the past year? Please describe the activities and attach any relevant documents or materials.

Accomplishments in 2007-2008:

- ✓ Use of CSU Fullerton's ATI Blackboard site
- ✓ Monthly meetings of team members
- ✓ Use of a shared folder with documents, timelines, etc. for ATI team members
- ✓ ATI Team has met with the President's Cabinet, Academic Senate, Academic Chairs, and the Council of Academic Deans

Plans for 2008-2009:

- Buyer training for all CSU, Chico buyers
- Training and communication activities for end users (requestors)
- Provide related ATI and procurement deliverables

Barriers to completion:

- End user training schedule
- Complexity of 508 for end user understanding with the rare instance/recurrence of 508 purchases

Observations/discoveries:

Without the funding for 508 Compliance Officer it will take time for the campus community to become more aware of Section 508 requirements

8. What 508 procurement communication activities took place during the past year? How many people were trained? What roles were they in? Please describe the activities and attach any relevant documents or materials.

Accomplishments in 2007-2008:

- ✓ Trained IT Buyer II on 508 compliance

- ✓ Previous Director attended training and participated in conference calls

Plans for 2008-2009:

- Training of all CSU, Chico buyers
- Provide related ATI and procurement deliverables

Barriers to completion:

- The retirement and ultimate hiring of a new Director of Procurement & Contract services has presented some challenges for continuity of processes and information for the procurement plan.
- CSU, Chico is currently upgrading the financial module for PeopleSoft and a significant amount of staffing time within the Procurement Office is involved with the upgrade

Observations/discoveries:

Without the funding for 508 Compliance Officer it will take time for the campus community to become more aware and ultimately trained regarding Section 508 requirements

9. What activities took place to evaluate the implementation of 508? Please describe. What were the results?

Accomplishments in 2007-2008:

- ✓ Tracking milestones and deliverables of Section 508 compliance implementation on MS Project to allow team members to focus on certain aspects requirements and provide better tracking of completion of tasks.
- ✓ Monthly meeting of team for enhanced communication and better sharing of information

Plans for 2008-2009:

- Continue with tracking
- Provide related ATI and procurement deliverables

Barriers to completion:

- Budget constraints
- Lack of 580 Compliance Officer

Observations/discoveries:

Procurement website will be re-designed this year incorporating ATI forms and information. Procurement will be able to track usage of new forms.

10. In what ways did implementation of your 508 Procurement Plan differ from what had been planned? Why?

Accomplishments in 2007-2008:

- No change

Plans for 2008-2009:

- Provide related ATI and procurement deliverables
- Procurement Forms (see attached) to be rolled out to requestors

- Initiate communications & training of requestors

Barriers to completion:

- Retirement of Director of Procurement caused the delay of form release to the campus and has presented challenges for continuity of processes, procedures, and information dissemination.

Observations/discoveries:

Having an ATI team has allowed new Director to come up to speed quicker after retirement of past Director. Usage of CSU, Fullerton's Blackboard site has been very beneficial to procurement implementation.

11. What additional resources would assist your campus in implementing 508 procurement objectives?

- ✓ Funding for 508 Compliance Officer
- ✓ Specific CSU buyer training
- ✓ Listing of vendors with CMAS, WSCA, or Master agreements that have a VPAT on file or have an exception on file