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DATE: September 28, 2006

TO: Presidents

FROM: Gary W. Reichard
Executive Vice Chancellor / Chief Academic Officer

Richard P. West
Executive Vice Chancellor / Chief Financial Officer

RE: Access to Electronic and Information Technology for Persons with Disabilities

This coded memorandum sets forth the roadmap for ensuring accessibility of information technology and resources in compliance with federal and state laws and CSU policy. Please share this memorandum widely on campus.

I. BACKGROUND

The California State University (CSU) has an ongoing commitment to provide access to information resources and technologies to individuals with disabilities. This commitment is articulated in the January 2005 Executive Order 926, the CSU Board of Trustees Policy on Disability Support and Accommodations <http://www.calstate.edu/EO/EO-926.html>.

“It is the policy of the CSU to make information technology resources and services accessible to all CSU students, faculty, staff and the general public regardless of disability.”

This policy is premised on federal and state laws including but not limited to Section 504 of the 1973 Rehabilitation Act; the Americans with Disabilities Act of 1990; Section 255 of the Telecommunications Act of 1996; and California Government Code 11135 of 2003 which applies Section 508 of the Rehabilitation Act as amended in 1998 to the CSU.

In January 2006, the CSU launched the Accessible Technology Initiative (ATI) in order to develop the work plan, guidance, and resources to assist campuses in carrying out the accessible technology provisions of EO 926. Significant consultation took place in the development of this plan. Those consulted included the Technology Steering Committee (TSC), the Statewide Academic Senate, the Academic Technology Advisory Committee (ATAC), the Provosts Technology Steering Committee (PTSC), the Council of Administration and Business Officers (CABO), Student Affairs Vice Presidents, the CSU Services to Students with Disabilities Advisory

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Sonoma

Stanislaus

Committee, the Information Technology Advisory Committee (ITAC), and other systemwide advisory bodies and groups.

II. ACCESSIBLE TECHNOLOGY INITIATIVE (ATI) WORK PLAN

Ensuring the accessibility of information technology and resources is a process for continuous improvement that will require a multi-year, phased approach. Given the iterative nature of this process, the implementation will need to occur in stages. A three-year roadmap addresses the three priorities below:

- Web Accessibility
- Instructional Materials Accessibility
- Accessible Electronic and Information Technology (E&IT) Procurement

Year One (2006-07): PLANNING AND EVALUATION

The focus of this first year is on planning, policy and procedures development, communication, and training. Just as campuses had to develop transition plans for the removal of physical access barriers, so they will need to create a technology access transition plan based upon a self-evaluation of the accessibility of their IT products and services. A template for this self-evaluation plan will be available to campuses at the end of October 2006. Initial implementation will begin the second half of the year.

Year Two (2007-08): IMPLEMENTATION

The second year begins full implementation of campus plans with the goal of integrating accessibility at the design stage of software, web, and course development, as well as in business and instructional practices.

Year Three (2008-09): ASSESSMENT

The third year begins the assessment process to determine the outcomes achieved and the effectiveness of plan implementation. Campuses will adjust their strategies and actions as necessary based on assessment results.

III. PRIORITIES, TIMELINES, AND REQUIRED ACTIONS

Priority One: Web Accessibility

The Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973 require the CSU to provide qualified individuals with disabilities equal access to their programs, services, or activities. Access to the Internet and its resources is considered an area where the ADA applies. The need to make websites, web applications, and digital content accessible is also underscored by California Government Code 11135, which applies Section 508 requirements to the CSU. The ubiquity of the Internet in delivering information and providing services is reason to make its accessibility a priority for the CSU.

Creating and maintaining accessible websites will be ongoing. The dynamic nature of the web and the continuous updating of content requires a process that can be facilitated by the use of an enterprise-wide web evaluation and monitoring tool along with well-defined campus policy and implementation procedures.

Policy Development

No later than January 2007, each campus is directed to adopt and issue a campus-wide web accessibility policy that addresses the following:

- Identification of person(s) responsible for web accessibility compliance and training.
- Milestones and timelines that conform to the dates listed below.
- A monitoring, remediation, and accountability process.
- A process to provide for alternative ways for obtaining information during any period in which websites are undergoing retrofit.

- A process or system to document accessibility of audited applications and fixes.
- A communication plan to educate the campus about the policy.
- A web accessibility training plan for those who develop and maintain websites.

Timeline

The milestones identified take into consideration infrastructure development and represent targets for meeting accessibility requirements. To mitigate risk and cost, campuses are urged to begin implementation as soon as possible.

January 2007: Evaluate the top 20 most accessed pages of the campus public website for conformance with accessibility standards and remediate pages as required. Pages associated with programs or services frequented by individuals with disabilities should be included in this evaluation even though these may not be in the top 20.

Beginning immediately and no later than March 2007: New and updated websites, web applications, and web content produced by the CSU or by third-party developers will, at the minimum, conform to applicable baseline accessibility standards as defined in Section 508, Subpart B, and where appropriate, Subpart C. <http://www.access-board.gov/sec508/standards.htm>

May 15, 2007: Completion of websites and web applications self-evaluation as part of the campus Technology Access Transition Plan, and establishment of retrofitting priorities. Campuses will be expected to follow their Technology Access Transition Plan in eliminating accessibility barriers.

June 15, 2007: Submission of the Self-Evaluation and Technology Access Transition Plan.

May 15, 2008: All new and existing websites, web content, and web applications, including legacy content

June 15, 2008: Submission of Progress Report for Year Two.

June 15, 2009: Submission of Assessment Report.

Resources

An RFP for an enterprise-wide web monitoring and evaluation tool is underway, with a projected contract award date in October 2006. The Self-Evaluation Tool for the formation of the Technology Access Transition Plan and other resources for making accessible websites will be available from the ATI website. The ATI staff will coordinate trainings for the use of the web monitoring tool at appropriate times during the year.

Priority Two: Instructional Materials Accessibility

To comply with the Americans with Disabilities Act of 1990, Section 504 of the 1973 Rehabilitation Act, and with California Government Code 11135, the CSU is required to make its instructional materials and online course materials accessible to persons with disabilities in order to provide them with effective communication. Communication should be, to the extent possible, as effective for persons with disabilities as it is for persons without disabilities. An essential component of effective communication is timeliness of delivery of accessible formats. To the extent possible, instructional materials, including online course materials, must be accessible to students with disabilities at the same time it is available to any other student enrolled in that program. Recent Office for Civil Rights resolutions with four CSU campuses emphasize the importance of campus support for the timely provision of accessible instructional materials to students with disabilities. In order to achieve this goal, collaboration among faculty, disability resource centers, bookstores, academic departments, academic technology staff, and students with disabilities will be necessary. Additionally, systemwide support for working with vendors and publishers to address the accessibility of materials will be critical.

Instructional Materials Accessibility Plan Development

By June 2007, following consultation with local senates as appropriate, each campus will create a plan to support faculty and staff practices that will ensure the timely access to instructional materials. This plan will include:

- Timely adoption of textbooks by faculty.
- Strategy for identification of textbooks for late-hire faculty.
- Strategy for the early identification of students with disabilities who require curriculum access and the use of alternate media.
- Use of the campus learning management system (LMS) for delivering technology-enabled courses, and for posting syllabi and instructional materials online for traditional face-to-face and hybrid or blended courses.
- The incorporation of accessibility requirements in the purchase of digital or multimedia instructional materials (captions on videos, for example).
- Alignment of academic technology resources to assist faculty in the creation of accessible technology-mediated courses.
- A communication process and training plan to educate students, staff, and faculty about the campus Instructional Materials Accessibility Plan.
- Identification of roles and responsibilities, and an evaluation process to measure the effectiveness of the plan.
- Milestones and timelines that conform to the dates listed below.

Timelines

June 15, 2007: Submission of the campus Instructional Materials Accessibility Plan.

July 1, 2007: Accessible design will be incorporated into the creation of new technology-enabled courses. Existing technology-enabled course content will be made accessible at the point of course redesign or when a student with a disability enrolls in the course.

June 15, 2008: Submission of Year Two Progress Report.

June 15, 2009: Submission of Assessment Report.

July 1, 2009: All new and existing technology-enabled courses will incorporate accessibility into the course development and course content authoring process.

Resources

The ATI team is developing a prototype workflow for the authoring of accessible content and a faculty toolkit to help raise awareness about accessible instructional practices. The CSU Center for Accessible Media (CAM) will develop best practices for working with digital and multimedia. Guidelines and strategies for captioning (speech-to-text) will be available.

Priority Three: Accessible Electronic and Information Technology (E&IT) Procurement

California Government Code 11135 applies Section 508 of the 1973 Rehabilitation Act as amended in 1998 to state entities and to the CSU. 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. Section 508 includes a set of accessibility standards for six categories of electronic and information technology (E&IT) including websites and web applications, hardware, software, telecommunications, multimedia, and self-contained closed products like copiers, fax machines, kiosks, etc. The CSU must incorporate Section 508 standards as it develops or acquires new E&IT resources. In terms of procurement, the CSU is required to purchase

E&IT products and services that conform to the standards established for each category of covered items, if such are commercially available, and their purchase does not result in an undue burden or fundamental alteration.

Policy Development

By January 2007, each campus shall develop a policy and implementation plan for the procurement of electronic and information technology covered under Section 508 in compliance with Government Code 11135. The policy shall address the following:

- Identification of the roles and responsibilities for overseeing Section 508 procurement compliance.
- Milestones and timelines that conform to the dates listed below.
- Identification of the process and person(s) responsible for determining “undue burden” and “fundamental alteration”.
- Communication and training plan to educate the campus about Section 508 requirements and the established policy.

Timelines

January 2007: Campus policy developed and promulgated; begin pilot implementation of procurement process for formal solicitations (i.e. RFPs & RFQs).

June 15, 2007: Submission of Accessible E&IT Procurement Progress Report.

July 1, 2007: Implementation of procurement process for all E&IT purchases except credit card purchases.

March 1, 2008: Implementation of procurement process to include credit card purchases.

June 15, 2008: Submission of Year Two Progress Report.

June 15, 2009: Submission of Assessment Report.

Resources:

The ATI staff in conjunction with campus and systemwide procurement officers is developing a template for the incorporation of Section 508 into the procurement process. Tools and resources for the implementation of this process will be available from the ATI website. The ATI staff will coordinate initial systemwide training of this process.

IV. REPORTING REQUIREMENTS

Campuses are required to submit the following deliverables by the stated timeline, preferably electronically, to Dr. Keith Boyum, Associate Vice Chancellor, Academic Affairs, at kboyum@calstate.edu. You may reach Dr. Boyum at (562) 951-4712 [voice] or via fax at (562) 951-4981.

October 26, 2006: Name of the presidential designee and/or Executive Sponsor to lead campus EO 926 accessible technology planning and monitoring efforts.

January 29, 2007: Web Accessibility Policy & Procedures.
Accessible E&IT Procurement Policy & Procedures.

June 15, 2007: Instructional Materials Accessibility Plan.
Self-Evaluation and Technology Access Transition Plan.
Website Monitoring Progress Report.
Accessible E&IT Procurement Progress Report.

June 15, 2008: Progress Report for all three priorities.

June 15, 2009: Assessment Report for all three priorities.

V. SYSTEMWIDE ACTIONS AND RESOURCES

As campuses take action to meet implementation goals, the Chancellor's Office, through the Accessible Technology Initiative, will support systemwide projects that will assist campuses in their efforts. One of these projects is the Center for Alternate Media (CAM), established in 2004 to enable the sharing of accessible formats of textbooks amongst CSU campuses. To further assist campuses, the mission of the CAM will be expanded to include research and development of tools and best practices for the creation of accessible digital content. The name change to the Center for Accessible Media indicates this expanded role. In addition to systemwide projects, the following resources are also available to campuses.

- ATI website: Specific guidelines, tools and resources related to the implementation of the three priorities will be available beginning October 29, 2006 on the ATI website: www.calstate.edu/accessibility.
- ATI Staff Consultation: The ATI staff will be available to assist campuses in the development and implementation of their plans. Please contact Ms. Mary Cheng, ATI Director, at mary.cheng@csueastbay.edu or call (510) 885-2844.

VI. ATI TECHNICAL ASSISTANCE WORKSHOP: October 30-31, 2006

The ATI Technical Assistance Workshop is scheduled on October 30-31, 2006 at the Crowne Plaza Hotel in LAX. Campuses are invited to send their planning team to obtain the required information, training, and resources for the successful implementation of this initiative. Please RSVP with the names of those who will be attending to Ms. Roma Wallace at rwallace@calstate.edu or call (562) 951-4253. For additional information, please go to www.calstate.edu/accessibility.

cc: Chancellor Charles B. Reed
Provosts/Vice Presidents of Academic Affairs
Vice Presidents of Administration
Vice Presidents of Student Affairs
Vice Presidents of Development
Chief Information Officers
Chair, CSU Academic Senate
Campus Academic Senate Chairs
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