

# An End User/Department's Guide to Getting Started with your E&IT Purchase

For each PDF form, you may download to your computer and "File>Save As" with a new file name. You may enter most information into the form before you print it, but we do not have digital signatures and you will need to either fax or mail signature pages.

To get you started with your E&IT purchase, these steps will guide you with an electronic process to request and meet compliance with Section 508 accessibility standards for your E&IT product purchases.

Please Note: All forms listed below can be downloaded from the Forms section of the ADA Compliance Office website at:

<http://www.adacompliance.sjsu.edu/documents/forms.htm>.

## 1. Step 1: Begin with the Requisition and the Checklist

- Complete the Purchasing requisition requirements found on the SJSU Finance Web Component ([https://cmsweb.sjsu.edu/inpt\\_login.asp](https://cmsweb.sjsu.edu/inpt_login.asp)).
- Once a requisition number is assigned, complete the SJSU E&IT Procurement Checklist (PDF) for an E&IT purchase request. As instructed on the form, complete only the **first page** of the checklist and forward the checklist to the ADA Compliance Office.
- Upon receipt, the ADA Compliance Office will contact you to review your individual needs for the E&IT purchase and advise on Section 508 requirements and this new process.

## 2. Step 2: Exceptions under Section 508 standards

Section 508 and Cal Gov Code Section 11135 (c)(2) provide for specific exceptions which are more completely described in the [Accessible E&IT Procurement Implementation Plan \(PDF\)](#) to include:

- Net Cost Increase (based on CA Code 11135[c][2])
- Commercial Unavailability (not in commercial marketplace)
- Sole Brand (only one product model meets functional requirements)
- Back Office (includes mostly data center and communication closet equipment)
- Fundamental Alteration (e.g. cell phones, PDAs, pagers, hand-held devices)
- Undue Burden (see E&IT Procurement Plan, Appendix C)

Once you have reviewed the exceptions and you have determined that your product(s) will qualify for one of these, complete the [SJSU E&IT](#)



[Exceptions Documentation \(PDF\)](#) and submit it to the ADA Compliance Office for consideration. Exception documentation may be submitted concurrently with the [Checklist \(PDF\)](#).

- The ADA Compliance Office will work with you to help you determine if your product(s) qualify for an exception.
- Apart from the “Back-Office” exception, for all other exceptions you are required to provide “an alternative means of access.” **Go to Step 3** to review these requirements.
- The ADA Compliance Office will notify Procurement & Support Services and you if your exception is approved for the E&IT product or service.
- If you are requesting an Undue Burden exception, you will need to **continue to Step 4**.
- If your product(s) did not require an exception, **continue to Step 5 (Optional)**.

### Step 3: Providing an alternative means of access

Under Section 508 standards, CSU has a statutory obligation to make information and data available by an alternative means of access if acquiring the E&IT product would impose an undue burden or is an approved exception. The CSU has additional obligations under Sections 501 and 504 of the Rehabilitation Act, including the obligation to provide employees with disabilities “reasonable accommodations” which focus on the needs of a particular individual with a disability.

- When an exception from Section 508 standards is approved, the ADA Compliance Office and you, in consultation with appropriate campus offices, will assess the potential impact on students, employees, and members of the public and plan for alternate access methods and/or accommodation for persons with disabilities.

### Step 4: Undue Burden exception to Section 508 standards

Section 508 standards define undue burden as a product acquisition that causes “significant difficulty or expense” to the organization. Even though the definition of “undue burden” involves expense, you should understand that determining an undue burden under Section 508 is a very difficult threshold to meet.

- When determining if an E&IT product qualifies for an undue burden, the campus must consider the resources available to the entire



campus, not only to the college, department or program for which the product is being developed, procured, maintained, or used. The resources of even the whole CSU system may be considered.

- To initiate the determination of whether an E&IT product or service qualifies as an undue burden, you must submit both the [SJSU E&IT Exceptions Documentation \(PDF\)](#) and the [SJSU Request for Undue Burden Exception \(PDF\)](#), to the ADA Compliance Office.
- After the review, the Compliance Office will forward the recommendation to the campus President and the appropriate Division Vice President. The President will have the final authority to approve or disapprove the undue burden request.
- **If an undue burden is approved, it is important to note that by statutory obligations SJSU must provide alternative access to persons with disabilities. This should be part of the Compliance Office recommendation.**

**Step 5 (Optional): As you becoming familiar with purchasing E&IT products, you may consider a way to save time by adding Section 508 in your requirements:**

**How to Add Section 508 in your requirements (Optional):**

As you do with most purchase requests, you will be developing end user functional requirements for your products or services. This means you need to determine: how, who, what, and why the E&IT product or service will be used. Basically, why does the department need this product or service?

The difference with Section 508 requirements is that you will be *adding* accessibility into the equation. You could add a requirement that indicates equipment must contain an alternate mode of access for individuals with disabilities, such as visual and hearing impairments. You would not have to determine how the equipment should do this; you would look to the manufacturer to have the technology in the equipment. For instance, if you are purchasing,

- DVD/VCR equipment, it should be equipped with “close captioning decoding” for hearing impaired and raised tactile key buttons for vision impaired users.
- Telephones, the phones should support TTY format applications for hearing impaired as well as alternate mode of access for vision impaired users.



To begin the process of adding Section 508 “accessibility” into your purchase:

1. Figure out as specifically as possible what you need:
  - How fast? How many pages? How big/small? What features? What functions?
2. Determine what’s out there:
  - Figure out a few products that meet your needs
  - All products should meet your needs equally well
3. *Add* accessibility into the equation
  - You already do research for models, prices, features, durability
  - Just make accessibility one more item on the list.

*Remember*, you do not have to buy something that does not meet your needs.

