


Code: AA-2010-13

MEMORANDUM

Date: June 14, 2010
To: Presidents
From: Benjamin F. Quillian 
Subject: Revision of Accessible Technology Initiative Coded Memo

1. Background

The Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973 require that qualified individuals with disabilities be provided equal access to programs, services, or activities. California Government Code 11135 applies Section 508 of the 1973 Rehabilitation Act, as amended in 1998, to State entities and to the California State University (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. The CSU policy statement on accessibility was articulated in Executive Order 926. Implementation of this policy was guided by the Accessibility Technology Initiative (ATI), outlined in Coded Memo AA-2007-04 issued in 2007. This coded memo revises the overall approach, tasks and timelines described therein to reflect updated implementation steps. It also includes specific guidance regarding governance and roles for the ATI.

2. Vision/Mission/Goals/Scope

Vision: The CSU system will excel and provide leadership in using technology that is fully accessible through universal design (see [Principles of Universal Design](#)) to its students, faculty, staff and the general public.

Mission: The Accessible Technology Initiative will provide the resources, tools, training and expertise for the CSU system to ensure that instructional materials and the technology that are used will be accessible to all. Information materials and technologies include, but are not limited to “computer and network access and services, computer-delivered or enhanced

instruction, library electronic information resources, library online catalogs and homepages, campus informational web sites, computer-delivered or assisted administrative services, and voice and video programs and services.” (E.O. 926)

Goals:

- Provide students, faculty and the general public with disabilities access to technology that is timely and as seamless as possible.
- Reduce the need for and costs associated with the provision of individual accommodations for technology access.
- Foster ownership of accessibility throughout the CSU enterprise amongst all stakeholders to ensure that accessibility is designed into CSU operations, rather than addressed by Disabled Student Services through individualized accommodations.
- Improve the usability of technology for all CSU technology users through Universal Design as a basic approach.
- Address accessibility challenges consistently over time.
- Foster collaboration on accessibility issues among campuses.

Scope – The ATI applies to all CSU campuses and to the CSU Office of the Chancellor. It applies, but is not limited to, academic programs and services, student services, auxiliary programs and services, information resources and technologies, and procurement of goods and services.

3. ATI Implementation Approach

Now that the CSU has three years of experience in implementing the ATI, a revised Coded Memo is needed to modify the basic approach. In 2007, Coded Memorandum AA-2007-04 established the basic requirements for implementing the Accessible Technology Initiative in response to legal requirements amplified by experience at four campuses with the Office of Civil Rights regarding accessibility. Since then, the CSU system has made steady progress in implementing the ATI, and much has been learned about what is required on campuses to achieve the goals of the ATI. When Coded Memo AA-2007-04 was written, the CSU had little experience in working towards the ATI milestones and goals on a system-wide scale. The CSU is now integrating the accumulated knowledge and experience of the CSU campuses and the Chancellor’s Office into this revision of the original 2007 Coded Memo.

Technology is constantly improving, expanding and increasing in scope; ensuring accessibility requires continuous attention. Coded Memo AA-2007-04 includes specific goals, requirements and milestones, with a target of 2012 for full implementation. The CSU now understands that implementation of the ATI is a continuous activity, and while many of the milestones in implementing the ATI have been and will be accomplished within the timeframe envisioned in the 2007 Coded Memo, several important activities are more ongoing in nature. The technology in use on campuses is constantly changing, with new updates and innovations

continuously added to the many campus functions. The ATI will need to evolve to include these improvements in its scope. In addition, new breakthroughs in methods for making technology accessible will also need to be tracked and incorporated into the ongoing ATI effort on the campuses.

The ATI requirements and milestones should be flexible, allowing campuses to follow different plans for accomplishing them. Campuses may not reach the various ATI goals and milestones at the same time. Individual campuses have demonstrated leadership in many of the ATI areas, and others will be able to build upon their successes. Many different factors influence how each campus manages the goals of the ATI. Each campus needs to develop and update its own plan for ATI implementation and measure its accomplishments in each area. The approach of the CSU and its campuses is to demonstrate steady progress in reaching the broad ATI goals set forth in E.O. 926.

For FY 2009/10, the Chancellor's Office Information Technology Services (ITS) published and disseminated a set of documents to be used by campuses on a voluntary basis for conducting self-assessments of their accomplishments and challenges to date. Campuses should use these self-assessments as the basis for updating existing ATI implementation plans and for determining the current baseline of ATI accomplishments for their campus. Campuses that have elected not to conduct a self-assessment with these documents must still update their existing plans and determine a current baseline of activity for their campus. Campuses are expected to make continuous improvements in the level of ATI accomplishments, based on the campus plan. Campuses are not allowed to cease work on achieving ATI goals. Campuses are still expected to accomplish the ATI goals delineated in AA-2007-04. Through this Coded Memo, campuses are allowed to establish their own timeframes for achieving them (see appendices A and B for more guidance on principles and priorities of ATI).

The Chancellor's Office ITS must play a vital role in monitoring and facilitating the implementation of the ATI on campuses. With a system-wide perspective, ITS will analyze the overall effort and determine how to support the campuses through provision of guidelines, tools, training and other common resources that can help accelerate the implementation of the ATI and to minimize the economic impact of the ATI for individual campuses. The information submitted to ITS in the annual reports will be used by ITS to identify specific areas where campuses are experiencing challenges and to address them on a system-wide basis through a variety of tools and approaches.

4. Baseline Requirements

The Chancellor's Office ITS will determine, on a regular basis, at least every three years, which ATI goals and success indicators (from the annual reports) have become adopted by a majority

of CSU campuses and establish a baseline expectation for ATI system-wide implementation that will expand over time. In addition to actual CSU accomplishments, ITS may take into account commonly-accepted and adopted practices and tools that are widely available for establishing the baseline.

Starting in June, 2011, ITS will analyze the data from the prior year's annual campus reports to ascertain what level of accomplishment, if any, has been reached by a majority of campuses for each goal and success indicator. The collected information will be published in the same format as the annual reports and will become the baseline requirement for the CSU system. When the baseline requirements are published, ITS will also announce the period of time that all campuses will be given to bring their practices up to at least the baseline level for each goal and success indicator. See Appendix I for an example of a baseline requirement and Appendix F for more information concerning the timeline of the ATI process.

5. Responsibilities

Campus Responsibilities

Campuses are required to conduct a self-assessment during their preparation of their annual report for AY 09/10 and to revise their ATI plans according to the results. The revised campus plans should make note of accomplishments to date and also any significant changes in approach with respect to ATI objectives. These revised plans should be used by campuses for purposes of assessment and measuring progress. The revised campus plans should include a separate section indicating when the campus plans to accomplish the broad ATI goals from AA-2007-04, and this section should be submitted to ITS along with the annual report for AY 10/11.

Campuses must submit annual reports to the Chancellor's Office ITS detailing their progress to their plan, activities and challenges in each of the ATI priority areas: web accessibility, instructional materials accessibility and procurement. Once a baseline is established, campuses will be required to assess their status for the goals and success indicators as required by the baseline and will need to include specific plans for satisfying to baseline requirements, if necessary, in the annual report that is submitted subsequently. Annual reports will be due in November of each year beginning in 2010. ITS will establish the specific date that the reports will be due for each year and will notify the campuses of this date by the end of June of that year.

Chancellor's Office Information Technology Services Responsibilities

The documentation from campuses of their status and accomplishments in achieving the specific indicators will be collected and published online. Data from the reports will be analyzed by ITS for overall trends and themes, and ITS will identify common areas for which

campuses have requested assistance, guidance or opportunities for collaboration with other campuses.

ITS will prepare a summary analysis for campuses and for the system as a whole in a version appropriate for high level policy makers with broad observations and recommendations, as well as in a version with more specific details for those involved in ATI implementation. These analyses will be published in March of each year for the preceding year.

ITS will consult with the ATI Leadership Council to develop a recommendation for ATI annual priorities, based on the results of the reports. These recommendations will be presented to the Executive Sponsors Steering Committee (ESSC) for their review and input. See Appendix C for more information concerning the governance of ATI.

ITS will also keep track of system-wide accomplishments for the purpose of setting a baseline set of expectations for the CSU system as a whole. In consultation with the ATI Leadership Council and the ESSC, ITS will develop and publish an ATI Baseline based on AY 09/10 campus reports by June, 2011. Baseline requirements will consist of ATI goals and success indicators that have been met with the same levels of success by a majority of CSU campuses. This baseline will become the ATI requirement, to be met by all campuses within a timeframe to be announced when the baseline is published. ITS will revise this Baseline every three years.

6. Appendices:

A. Principles

B. Priority Setting

C. Governance and Authority

D. Definitions and Clarifications

E. ATI milestones and requirements from AA-2007-04 that have been replaced by the Baseline Approach.

F. Timeline for ATI process for 2010 – 2015.

G: ATI FY 2009/10 Self-Assessment Materials, which will be the framework for the FY 2010/11 Campus Reports (found at www.calstate.edu/accessibility)

H. FAQ's

I. Example of ATI Baseline Requirement

Appendix A: Principles for Implementation of the ATI

- Campuses need to collaborate on common accessibility challenges, share solutions and approaches, as well as resources.
- The CSU's ATI efforts are enhanced by statewide and national collaboration both through the use of standards, tools and strategies developed by others as well as through sharing CSU strengths with others.
- System-wide guidelines, developed by ITS for specific common challenges and practices, enable consistent and efficient outcomes.
- As ATI implementation on campuses evolves, a basic minimum standard should be adopted, based on widely shared accomplishments. This basic baseline should be revised and adjusted at least every three years.
- ATI implementation should be achieved through continuous progress that is planned, measured and documented.
- Resources for ATI implementation should be utilized based on priorities, with the greatest attention given to objectives with the highest impact.
- ATI processes need to become institutionalized as campus practices carried out by many different stakeholders throughout the campuses. Ongoing communication about the ATI is an important aspect of this principle.
- Campus customization of ATI implementation should be pursued only after standard approaches have been reviewed and the campus has determined an individual approach is more appropriate. Customized strategies must be balanced with the economies of scale that can be achieved through standardization.
- Each campus must establish its own plan for ATI implementation, taking into account its strengths, available leadership, challenges and resources. Each plan must include goals for each ATI priority area (web accessibility, instructional materials and procurement).
- In all cases, if achieving accessibility is either not possible or would constitute an undue burden, then plans to provide equally effective alternative access must be developed, documented, and communicated.

Appendix B: Priority Setting

In determining how to implement the ATI, campuses will need to set priorities for allocating resources and determining which projects should be undertaken before others. The following factors should be considered in setting these priorities:

- How many people are expected to make use of the technology?
- Is it likely to be used again in the future, or repeatedly?
- Is it available publicly, or only to a pre-determined audience?
- Is it required to be used for academic or institutional purposes?
- Is it the sole means for achieving its purpose? If alternatives are available, are they accessible?
- Will it be used by a program or service with a primary audience of persons with disabilities?

ITS should provide campuses with guidance with respect to using these factors for setting ATI priorities.

Appendix C: Governance and Authority

Ensuring the accessibility of information technology and resources is a shared responsibility that is spread across the campus and will require ongoing, overall institutional attention and commitment for its success. One of the common expectations within each ATI priority area is the identification of roles and responsibilities for each aspect of accessibility. Achieving accessibility will require collaboration among administrators, faculty, disability resource centers, bookstores, academic and student services departments, academic technology and other institutional staff, and students with disabilities. Campuses should institutionalize their accessibility compliance efforts by establishing policies that support the three ATI priorities.

The following expectations and responsibilities are necessary for ATI implementation:

a. Chancellor's Office Information Technology Services (ITS):

- Provide leadership and assist the ESSC in strategic planning;
- Monitor the implementation of the ATI on campuses primarily through review of campus reports as well as other interactions and activities with campuses;
- Find opportunities to advance accessibility in the CSU system as a whole;
- Define excellence in the context of the ATI and facilitate its achievement on campuses;
- Support the campuses through provision of guidelines, tools, training and other common resources.
- Identify and elevate best practices that can be used and replicated by other campuses and provide coaching and consultation for campuses to make use of them
- Identify opportunities to foster collaborations and take advantage of centralized synergies.
- Regularly consult with campuses regarding the establishment of an ATI baseline to be achieved by each campus.
- Provide system-wide support working with vendors and publishers to address the accessibility of materials.

b. ATI Leadership Council

- Provide strategic advice to Information Technology Services
- Manage development of action plans for policy recommendations, system-wide projects, campus-based projects, resource allocation recommendations
- Assign and review tasks of ATI work groups
- Review of system-wide projects and policies

- Make regular reports to stakeholder groups

c. Campus Executive Sponsors

- Convene campus-wide ATI Steering Committee
- Channel communications from the Chancellor's Office to appropriate parties on campus
- Coordinate decisions for campus participation in system-wide ATI events and activities
- Direct Campus ATI planning and monitoring efforts
- Represent campus on ESSC

d. Campus Higher Administration: Presidents, Provosts, CIO's, Vice-Presidents

- Guide ATI vision and goals
- Communicate the importance of ATI to the campus
- Participate in Governance of the ATI, as appropriate
- Review ATI progress on an annual basis and sign off on the campus plan
- Incorporate ATI priorities into campus priorities
- Ensure there are adequate resources for implementation of the campus's ATI plan and provision of equally effective access

e. Academic and Faculty Senates

- Support ATI with appropriate policy changes or additions
- The Faculty Senate Chair or their designee should be a member of the ATI Steering Committee and be Chair of the Instructional Materials Task Force

f. Centers for Faculty Development

- Coordinate or play an active role, as appropriate for each campus, in providing training in ATI related subjects for faculty
- Participate in relevant campus ATI Committees

g. Disability Support Services/Disability Resource Centers

- Participate in campus ATI Steering Committee
- Participate in development of processes and solutions for providing equally equivalent access, when necessary

h. ADA Compliance Officers

- Actively support ATI implementation
- Participate in campus ATI Steering Committee and working committees
- Conduct periodic evaluations of ADA compliance with respect to technology

i. Vice Presidents of Student Affairs

- Provide leadership with respect to ATI implementation
- Participate in governance
- Take active leadership with respect to communicating the importance of ATI within their Division

Appendix D: Definitions and Clarifications

Administrative Website or Webpage: A website or webpage is administrative if its primary function is governance, commerce, or navigation to institutional resources or publication of institutional information.

Critical Administrative Websites: These are websites determined by the campus to be important for its mission and operation.

Instructional Website or Web Content: A website or webpage, as well as the contents of such pages, is instructional if its primary function is as an informational resource for course completion. This includes but is not limited to items such as course syllabi, reading materials, test materials and multimedia.

Instructional Materials Priority Area: The Instructional Materials Priority Area encompasses all materials that are used as an informational resource for course completion, as well as administrative materials that are disseminated in electronic form to faculty, staff, students and/or the public. This includes documents, multi-media, software and equipment. The timely adoption requirement applies to documents and multi-media.

Learning Management System: A Learning Management System (LMS) is an administrative website. Content placed within the LMS may be either administrative (committee materials) or instructional (course materials) depending on its primary function.

The Procurement Priority Area includes, in addition to procurement as it is understood within the CSU system, the development, adoption (including when no funds are exchanged), maintenance or usage of electronic and information technology. Section 508 specifically includes all of these functions.

Equally Effective: Equally effective communication for persons with disabilities is based on:

1. timeliness of delivery,
2. accuracy of translation, and
3. delivery in a manner and medium appropriate to the disability of the person.

Aids, benefits, and services, to be equally effective, are not required to produce the identical result or level of achievement for disabled and non-disabled persons, but must afford disabled

persons equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement, in the most integrated setting appropriate to the person's needs.

Fundamental Alteration: A modification to a university program or service may constitute a fundamental alteration if it changes the essential purpose of the product or service or any of its components. In situations where a fundamental alteration can be documented, an equally effective alternate form of access must still be provided.

Undue Burden: A modification to a university program or service may constitute an undue burden if it involves "significant difficulty or expense". Because the Office of Civil Rights generally considers the institution's entire budget when reviewing claims of undue burden, the decision to invoke undue burden should be carefully weighed and sufficiently documented. In situations where an undue burden can be documented, an equally effective alternate form of access must still be provided.

System-wide guidelines: ITS will publish guidance or guidelines that campuses can follow for addressing common challenges and tasks. These might take the form of recommended processes or practices, a recommended approach to analyze and address a need or, principles to apply.

Annual priorities: Within the annual report form, each campus will list key plans for each goal. Taken together, these goals become the campuses annual priorities for the upcoming year.

Success Indicators: Within the annual report form for each ATI priority area, there is a list of goals for which campuses provide information. Under each goal, there is a list of indicators of success about which campuses are also asked to supply information as to their status and completion.

Appendix E: ATI milestones and requirements from AA-2007-04

These requirements are no longer required to be accomplished by the indicated dates. Along with the required annual report for AY 09/10, campuses are required to submit a statement indicating which of these requirements have already been met by the campus and when the campus plans to meet those that have yet to be accomplished.

Web Accessibility:

- **September 1, 2007** New and updated administrative websites, web applications and web content produced by the CSU or by third-party developers should, at a minimum, conform to baseline accessibility standards as defined in Section 508.
- **May 15, 2009** (Extended to June 1, 2010 by AA-2009-19) All administrative sites that are critical to institutional access (as established in the Web Accessibility Implementation Plan) should, at a minimum, conform to baseline accessibility standards as defined in Section 508. If remediation or replacement of the website is not possible or would constitute an undue burden, then a plan to provide an equally effective alternate form of access must be developed, documented, and communicated.
- **May 15, 2012** All websites at the CSU should fully conform to Section 508. Once again, undue burden plan requirements (as described above) apply.

Instructional Materials Accessibility

- **July 1, 2007** Campuses will implement the IMAP provisions related to timeliness of alternate formats for print-based instructional materials such as those reflected in points #1 to #4 above. These provisions should impact the timeliness of materials for the first academic term of Calendar Year, 2008.
- **Fall Term, 2008** (Extended to June 1, 2010 by AA-2009-19) new courses and new course content, including instructional materials and instructional websites, will be designed and authored in a manner that incorporates accessibility. If incorporating accessibility is not possible or would constitute an undue burden, then a plan to provide an equally effective alternate form of access must be developed, documented, and communicated. Existing course content will be made accessible at the point of course redesign or when a student with a disability enrolls in the course.
- **Fall Term, 2012** Instructional materials and instructional websites for all course offerings will be accessible. Once again, undue burden plan requirements (as described above) apply.

Accessible Electronic and Information Technology (E&IT) Procurement

- **No later than September 1, 2007** Implementation of an accessible procurement process for E&IT formal solicitations and acquisitions greater than \$50,000.
- **September 1, 2008** Implementation of an accessible procurement process for E&IT acquisitions greater than \$15,000. All procurement card purchases are exempt from the accessible procurement process at this point in time.
- **September 1, 2009** (Extended by June 1, 2010 by AA-2009-19) Implementation of an accessible procurement process for all E&IT procurement card acquisitions greater than \$2,500.
- **September 1, 2010** Implementation of an accessible procurement process for all E&IT acquisitions less than or equal to \$2,500 to be determined by this date, following evaluation of campus progress reports.

Appendix F: Timeline for ATI process for 2010 – 2015

June 2010	Publication of AY 09-10 Campus Report Framework. This framework will be updated at least every four years to keep it up-to-date. Updates will not be a major revision.
November 2010	AY 09-10 Campus Reports Due
March 2011	Publication of High Level Summary Analysis of Campus Reports and Detailed Version
November, 2011	(One time only) Revised campus ATI plans are due, along with this year's annual report
Winter 2011	Chancellor's Office ITS consultation with ATI Leadership Council and Executive Sponsors Steering Committee (ESSC) regarding priorities for FY 11-12

This schedule will repeat annually. The Campus Report Framework will be published annually, whether or not it has been updated.

June 2011	Publication of 1 st Baseline, followed by revised Baseline every three years thereafter. The deadline for system-wide implementation of Baseline goals will be established when the Baseline is published. Each new Baseline will be accompanied by a deadline for system-wide implementation.
June 2014	Publication of the 2 nd Baseline.

Appendix G: Self-Assessment Materials

The ATI Self-Assessment materials can be found on the [ATI public website](#).

Appendix H: Frequently Asked Questions (FAQ) about the new ATI Coded Memo

1. Under the new ATI Coded Memo, what is the status of the past milestones and goals?

These are the milestones from Coded Memo AA-2007-04 that have already gone into effect:

- **September 1, 2007** New and updated administrative websites, web applications and web content produced by the CSU or by third-party developers should, at a minimum, conform to baseline accessibility standards as defined in Section 508.
- **July 1, 2007** Campuses will implement the IMAP provisions related to timeliness of alternate formats for print-based instructional materials such as those reflected in points #1 to #4 above (see AA-2007-04 for these points). These provisions should impact the timeliness of materials for the first academic term of Calendar Year, 2008.
- **No later than September 1, 2007** Implementation of an accessible procurement process for E&IT formal solicitations and acquisitions greater than \$50,000.
- **September 1, 2008:** Implementation of an accessible procurement process for E&IT acquisitions greater than \$15,000. All procurement card purchases are exempt from the accessible procurement process at this point in time.

If a campus has not yet reached any of these milestones, this should be noted in the updated ATI campus plan, and the revised plan should describe how and when these milestones will be met. A separate statement accompanying the AY 10/11 should indicate which have been met and when the campus plans to accomplish those that have not yet been met.

2. What is the status of the milestones and goals that had not yet gone into effect (i.e., the Procurement milestone that all procurement card acquisitions greater than \$2,500 be included in an accessible procurement process)?

Some milestones were deferred until June 1, 2010 by Coded Memo AA-2009-19. Others would have gone into effect on future dates. It is expected that campuses will include these goals in their revised ATI plans, and that campuses will assign their own target dates for accomplishing them. A separate statement accompanying the AY 10/11 should indicate which, if any, of these have been met and when the campus plans to accomplish those that have not yet been met.

3. What will the baseline requirements look like and how will the baseline approach work?

The baseline requirements will use the same format as the campus reports. Each goal statement and each indicator of success will reflect the status level that has been reached by a majority of the campuses. See Appendix I.

4. Won't campuses be developing plans that result in an inconsistent approach to ATI implementation? Will vendors have a negative reaction to that? Could it prompt challenges?

The CSU Procurement Manual establishes basic processes for campuses, but within that structure, campuses have latitude to adopt their own practices. It is not unusual for campuses to develop different technical or other requirements for the same product. Campuses operate differently in many ways and also have developed different procurement procedures within the structure of the more general CSU system-wide requirements. Vendors, like many others, may have an initial expectation that all campuses operate in the same way. However, our campuses function with a large degree of autonomy. This would not be the basis of a procurement challenge, so long as each campus follows its own published procedures.

5. What should campuses do to revise their plans and bring them up to date?

Campuses will assess their current status for ATI implementation as a part of the process of preparing the annual report for AY 09/10. They should revise their plans for each ATI priority area based on the results. This should include a section, to be submitted along with the annual report for AY 10/11, on overall goals. That section should set forth which of the goals in Coded Memo AA-2007-04 have been met and when the campus expects to reach unmet goals.

6. In Appendix B, there is a list of factors to consider in determining the establishment of priorities for ATI implementation. The last question reads "Will it be used by a program or service with a primary audience of persons with disabilities?" Does this mean that technology that will not be used for an audience of persons with disabilities does not need to be accessible?

The sixth question is only one of six factors, all of which will need to be considered in determining campus ATI priorities. This question is a statement of an obvious consideration, that if a program or service using technology is known to be used by or intended for an audience of persons with disabilities, it must be accessible. Other factors can also lead to this conclusion, as well as positive answers to several of these questions. The CO will issue more detailed guidance regarding how campuses should use all of these factors.

Appendix I

Example of ATI Baseline Requirement

Background

This is a theoretical example of the ATI Baseline requirement for Goal 1.1 of the Web Accessibility priority and the success indicators within that goal. It is provided in order to illustrate the form of a Baseline requirement and is not an actual requirement.

Placeholder for text indicating that the ATI website will host recommended resources, practices, and names of campuses who have offered assistance with specific success indicators...

1.0. Web Accessibility

1.1. *Web Accessibility Evaluation Process*

Goal

Identify and repair or replace inaccessible websites, web applications, and digital content.

Required Status Level

Defined

Success Indicators

Success Indicator	Distribution of Campus Status Levels (09/10 AY)	Required Status Level (12/13 AY)
1.1.1 Assigned responsibility for the evaluation process to a body (person(s) or business entity).	Not Started: 1 Initiated: 2 Defined: 1 Established: 6 Managed: 12 Refining: 2	Managed
1.1.2 Inventoried all campus administrative websites.	Not Started: 1 Initiated: 2 Defined: 1 Established: 12 Managed: 6 Refining: 2	Established