MEMORANDUM

Date: July 24, 2015

To: Loren J. Blanchard
   Executive Vice Chancellor of Academic and
   Student Affairs and Chief Academic Officer

From: Larry Mandel
   Vice Chancellor and Chief Audit Officer

Subject: Audit Report 14-28, Accessible Technology, Systemwide

We have completed an audit of Accessible Technology, Systemwide, as part of our 2014 Audit Plan, and the final report is attached for your reference. The audit was conducted in accordance with the Institute of Internal Auditors’ International Standards for the Professional Practice of Internal Auditing.

I have reviewed the management response and have concluded that it appropriately addresses our recommendation. The management response has been incorporated into the final audit report, which has been posted to the Office of Audit and Advisory Services’ website. We will follow-up on the implementation of corrective actions outlined in the response and determine whether additional action is required.

Any observations not included in this report were discussed with your staff at the informal exit conference and may be subject to follow-up.

I wish to express my appreciation for the cooperation extended by chancellor’s office personnel over the course of this review.

c: Timothy P. White, Chancellor
ACCESSIBLE TECHNOLOGY

Systemwide

Audit Report 14-28
May 5, 2015
EXECUTIVE SUMMARY

OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of existing policies and procedures related to the implementation of the accessible technology initiative (ATI) and to determine the effectiveness over the related processes to support adherence to policy, or where appropriate to an industry-accepted standard, and to assess compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

CONCLUSION

Based upon the results of the work performed within the scope of the audit, the operational and administrative controls for implementing accessible technology (AT) were sufficient to meet the objectives of this audit. In general, the audit revealed that the campus AT programs were, for the most part, operating in accordance with published guidance and progress was being made toward accessibility of technology.

Although compliance objectives were met, we noted that some revisions should be made to published guidance to ensure that the campus AT programs continue to make sufficient progress to meet management expectations.

Specific observations, recommendations, and management responses are detailed in the remainder of this report.
OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. ACCESSIBLE TECHNOLOGY DIRECTIVES

    OBSERVATION

    The Coded Memorandum Academic Affairs (AA) 2013-03 governing AT did not adequately reflect current practices or management objectives.

    We reviewed AA 2013-03 and discussed it in detail with management. We noted the following:

    • Certain management reporting practices were not consistent with the directives issued within the coded memorandum.

    • The coded memorandum did not clearly define chancellor’s office (CO) and campus oversight responsibilities, nor did it require that reported results be distributed to CO executives or to campus presidents.

    • The coded memorandum did not clearly define the objectives for an AT compliance program at the CO.

    RECOMMENDATION

    We recommend that the CO review and update the AT coded memorandum to better reflect current practices and desired management objectives.

    MANAGEMENT RESPONSE

    We concur. The CO will review and update the AT coded memorandum to better reflect current practices and desired management objectives. This recommendation will be completed by October 2015.
GENERAL INFORMATION

BACKGROUND

In 1973, Congress adopted the Rehabilitation Act, prohibiting discrimination on the basis of disability and ensuring equal opportunity for people with disabilities at any federal agency, including any program or institution that receives federal funds. Section 504 of the Rehabilitation Act ensures certain civil rights for people with disabilities, including access to federally funded programs or activities. In June 1977, the federal government issued regulations implementing Section 504, and in response, California State University (CSU) campuses prepared self-evaluations identifying the steps that would ensure that students with disabilities had equal access to educational opportunities.

In 1990, the federal government enacted the Americans with Disabilities Act (ADA), which reaffirmed Section 504 of the Rehabilitation Act of 1973 and extended the discrimination prohibition to businesses and organizations that do not receive federal funds. The ADA also detailed additional criteria in the areas of employment, new construction or renovation, transportation, and telecommunications; and for public entities that employ 50 or more people; it required the appointment of an ADA coordinator, a self-evaluation, and a transition plan to itemize compliance steps.

In August 1998, President Bill Clinton signed into law the Rehabilitation Act Amendments of 1998. Among other things, the law requires federally funded programs and services to provide people with disabilities access to electronic and information technology. It also strengthened Section 508 of the Rehabilitation Act, which was enacted to eliminate barriers in information technology, make new opportunities available for people with disabilities, and encourage development of technologies that will help achieve these goals.

Government Code §11135 requires the CSU and other state governmental entities to comply with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended.

In 2004, the CSU implemented Executive Order 926, Policy on Disability Support and Accommodations, to make information technology resources and services accessible to all CSU students, faculty, and staff, as well as the general public. Concurrently, the CSU developed the Center for Accessible Media to help expedite the delivery of electronic instructional texts to eligible CSU students with disabilities. In January 2006, the CSU launched its ATI in order to develop the work plan, guidance, and resources to assist campuses in carrying out the AT provisions of its revised Policy on Disability Support and Accommodations. CSU ATI plans are continuously developing and were revised and extended through policy every year from 2007 to 2014 based on experiences reported by the campuses and the understanding that ATI requirements and milestones should be flexible, allowing campuses to follow different plans for accomplishing them. It is anticipated that the ATI will continue to evolve as new needs are identified.

In January 2013, the CSU issued AA 2013-3, Accessible Technology Initiative, to provide campuses with guidance for implementing AT. The memorandum establishes responsibilities and outlines overall governance, specified project planning, and established implementation timelines.
SCOPE

Our audit and evaluation included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. The audit focused on procedures in effect from January 1, 2014, through July 18, 2014.

During the course of the audit, we visited six campuses: Dominguez Hills, Los Angeles, Pomona, San Diego, San Francisco, and San Marcos. We interviewed campus personnel and audited procedures in effect at the time of the audit.

We focused primarily on the internal administrative, compliance, and operational controls over AT activities. Specifically, we reviewed and tested:

- Monitoring of the quality and effectiveness of campus ATI program services.
- Resolution of complaints and grievances relating to program accessibility.
- Qualifications of services to students with disabilities staff and campuswide training practices.
- Provision of reasonable technology access and accommodations to applicants and employees.
- Provision of programs, services, and activities that are readily accessible to disabled individuals.
- Ongoing updates and monitoring of the ATI implementation plan.
- Prioritization of ATI implementation tasks and plans.
- Development, documentation, and communication of equally effective alternative access.
- Adequacy of ATI training.
- Compliance with the accessible electronic and information technology procurement program.

As a result of changing conditions and the degree of compliance with procedures, the effectiveness of controls changes over time. Specific limitations that may hinder the effectiveness of an otherwise adequate system of controls include, but are not limited to, resource constraints, faulty judgments, unintentional errors, circumvention by collusion, and management overrides. Establishing controls that would prevent all these limitations would not be cost-effective; moreover, an audit may not always detect these limitations.

CRITERIA

Our audit was based upon standards as set forth in CSU Board of Trustee policies; Office of the Chancellor policies, letters, and directives; campus procedures; and other sound administrative practices. This audit was conducted in conformance with the Institute of Internal Auditors’ International Standards for the Professional Practice of Internal Auditing.
This review emphasized, but was not limited to, compliance with:

- Rehabilitation Act of 1973, as amended, *Americans with Disabilities Act*
- Executive Order 926, *Policy on Disability Support and Accommodations*
- Government Code §11135
- AA 2013-3, *Accessible Technology Initiative*

**AUDIT TEAM**

- Senior Director: Mike Caldera
- Audit Manager: Greg Dove
- Senior Auditor: Linda Rathfelder
- Senior Auditor: Kim Pham