APPENDICES

APPENDIX A: Personnel Contacted
APPENDIX B: Campus Response
APPENDIX C: Chancellor’s Acceptance

ABBREVIATIONS

AA          Academic Affairs
ADA         Americans with Disabilities Act
AT          Accessible Technology
ATI         Accessible Technology Initiative
CSU         California State University
E&IT        Electronic and Information Technology
IMAP        Instructional Materials Accessibility Plan
OAAS        Office of Audit and Advisory Services
EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of Audit and Advisory Services (OAAS) during the last quarter of 2013, the Board of Trustees, at its January 2014 meeting, directed that Accessible Technology (AT) be reviewed. The OAAS has never reviewed AT as a stand-alone audit, but some aspects of AT were examined during the Americans with Disabilities Act compliance audit in 2011.

We visited the San Diego State University campus from February 17, 2014, through March 3, 2014, and audited the procedures in effect at that time.

In our opinion, except for the effect of the weaknesses described below, the fiscal, operational, and administrative controls for AT activities as of March 3, 2014, taken as a whole, were sufficient to meet the objectives stated in the “Purpose” section of this report. Areas of concern include: governance, procurement, and instructional materials.

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.

The following summary provides management with an overview of conditions requiring attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [ ] refer to page numbers in the report.

GOVERNANCE [6]

Administration of the accessible technology initiative (ATI) program needed improvement. Specifically, responsibilities and duties of the executive sponsor and ATI steering committee were not well defined, and the ATI committee did not have an effective oversight role in developing plans, setting priorities, developing timelines, or tracking and removing barriers to achieving goals. Furthermore, the AT plan did not provide clear and measurable steps for achieving goals listed in the current annual cycle as “Not Started” or “Initiated,” nor did it describe how priorities were determined. Additionally, the campus ATI annual report status indicators did not accurately reflect actual progress toward ATI objectives.

PROCUREMENT [8]

The campus did not require an AT assessment for all electronic and information technology purchases.

INSTRUCTIONAL MATERIALS [9]

The campus did not have a process in place to ensure that instructional materials for new courses were AT-compliant or to ensure that the course materials remained AT-compliant. Also, AT equipment was not available to students during evening classes. In addition, the AT plan did not provide clear and measurable goals and objectives for faculty training and participation in the ATI.
INTRODUCTION

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. The law applies to all federal agencies, which must ensure that any electronic and information technology that is developed, procured, maintained, or used is accessible to employees and members of the public with disabilities. Section 508 also describes various means for disseminating information, including computers, software, and electronic office equipment. It applies to, but is not solely focused on, federal web pages on the Internet. The law does not apply to private industry or state and local government, but those entities must comply with the law if they are receiving federal funds or under contract with a federal agency. 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 Accessible Technology Initiative (ATI) in order to develop the work plan, guidance, and resources to assist campuses in carrying out the accessible technology (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 Coded memorandum Academic Affairs 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.
PURPOSE

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to compliance with the CSU ATI and to determine the adequacy of controls over related processes to ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

Within the audit objective, specific goals included determining whether:

- Administration of AT compliance incorporates a defined mission, stated goals and objectives, and clear lines of organizational authority and responsibility, as well as formation of an ATI Steering Committee.

- Policies and procedures are current and comprehensive, and distribution procedures are effective.

- The adequacy of and satisfaction with the ATI program are consistently monitored and assessed.

- Campus notification and complaints processes ensure appropriate compliance with regulatory requirements, as well as timely and adequate resolution of noted disability-related issues.

- Reasonable access and accommodations are provided to applicants and employees in compliance with Title I of the ADA, and student disability services comply with state law, as well as CSU and campus policies.

- Campus technology programs, services, and activities are readily accessible to all people, and auxiliary aids and other equipment for people with disabilities are properly maintained and safeguarded.

- The campus has developed and documented an ATI implementation plan, including ongoing updates and monitoring through self-assessments.

- Equally effective alternative access to programs and facilities is developed, documented, and communicated.

- Procedures to ensure compliance with the accessible electronic and information technology procurement program are adequate.

- Campus training for AT is adequate.
SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Audit Agenda Item 4 of the January 28 and 29, 2014, meeting of the Committee on Audit stated that AT compliance includes compliance with federal, state, and local rules and regulations that relate to the ADA of 1990, Title 42, Section 504 as it applies to accessible technology requirements and program access. Of primary concern is appropriateness of systemwide guidance, management culture, program access considerations, and compliance with reporting standards and requirements. Proposed audit scope would include review of Trustee policy, systemwide directives, and campus policies and procedures; examination of management compliance efforts; analysis of reported campus and systemwide statistics; and testing of reasonable accommodation efforts.

Our study and evaluation were conducted in accordance with the International Standards for the Professional Practice of Internal Auditing issued by the Institute of Internal Auditors and included the audit tests we considered necessary in determining whether fiscal, operational, and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with federal and state regulations and guidance, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. The audit focused on procedures in effect from January 1, 2012, through March 3, 2014.

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.
OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

GOVERNANCE

PROGRAM ADMINISTRATION

Administration of the campus accessible technology initiative (ATI) program needed improvement.

We found that:

- Responsibilities and duties of the executive sponsor and ATI steering committee were not well defined, which impacted the campus’ ability to achieve cross-divisional goals.

- The ATI committee did not have an effective oversight role in developing plans, setting priorities, developing timelines, or tracking and removing barriers to achieving program goals.

Coded memorandum Academic Affairs (AA) 2013-3, Accessible Technology Initiative, dated January 29, 2013, states that the campus ATI steering committee is responsible for overseeing ATI implementation. The campus executive sponsor should conduct regular ATI steering committee meetings no less than twice per year and ensure that the committee membership is comprised of all key stakeholder groups. It further states one of the key components of the ATI is to ensure continuous quality improvement and that some existing process barriers may take years to remediate, which requires work to achieve incremental improvements in barrier removal each year. One of the campus implementation steps indicates the ATI steering committee should engage in a periodic administrative review process regarding challenges, milestones, resources, and documenting ongoing progress.

The interim chief information officer stated that the roles and duties became less defined when several key members, including the executive sponsor, left the university.

Poorly defined roles and objectives and ineffective oversight of the ATI committee increases the risk that the program will not be administered effectively and barriers will not be removed in a timely manner.

Recommendation 1

We recommend that the campus:

a. Clearly define the responsibilities and duties of the executive sponsor and ATI steering committee.

b. Strengthen the ATI committee’s oversight role in developing plans, setting priorities, developing timelines, and tracking or removing barriers to achieving program goals.
Campus Response

We concur. The campus will clearly define the responsibilities and duties of the executive sponsor and ATI steering committee. This also includes strengthening the ATI committee’s oversight role in developing plans, setting priorities, developing timelines, and tracking or removing barriers to achieving program goals. This will be completed by October 31, 2014.

ACCESSIBLE TECHNOLOGY PLAN

The accessible technology (AT) plan did not provide clear and measurable steps for achieving goals listed in the current annual cycle as “Not Started” or “Initiated,” nor did it describe how priorities were determined.

Coded memorandum AA-2013-03, Accessible Technology Initiative, dated January 29, 2013, states that each year the campus will review and update the ATI campus plan to guide implementation. The plan will indicate the specific success indicators on which the campus will focus its efforts across the three priority areas. It also states that when developing the plan, campuses should consider current campus progress as described in the campus annual report with particular attention to success indicators with a status level of “Not Started” or “Initiated.”

The interim chief information officer stated that measurable milestones and target dates had been established for the current year, but that implementation plans for compliance in all subsequent sections of the AT plan had not yet been considered.

Lack of clear and measurable steps for achieving goals increases the risk that the campus AT implementation plan may not achieve some objectives for years, and accordingly, that campus goals and objectives may not be reached in a timely manner.

Recommendation 2

We recommend that the campus update the AT plan to provide clear and measurable steps for achieving goals listed in the current annual cycle as “Not Started” or “Initiated” and to describe how priorities will be determined.

Campus Response

We concur. The AT plan will be updated to include clear and measurable steps for achieving goals, as well as describing how priorities will be determined. This will be completed by December 31, 2014.

ACCESSIBLE TECHNOLOGY REPORTING

The campus ATI annual report status indicators did not accurately reflect actual progress toward ATI objectives.
Specifically, we noted that:

- Reported status levels were not always accompanied by supporting documentation or did not reflect the specific activities required to move to the next level.
- Some items were listed as “Initiated” in 2001, but had no subsequent progress.
- Disability services tracked requests for captioning from student request to student delivery, but did not monitor the elapsed duration of each stage of the request or the total duration.
- The status of compliance and participation in the syllabi project did not include metrics to measure progress or identify roadblocks.
- Captioned library materials usage was not tracked or monitored to determine whether available resources were being used for courses.

Coded memorandum AA-2013-03, Accessible Technology Initiative, dated January 29, 2013, states that each year the campus will review and update the ATI campus plan to guide implementation. The plan will indicate the specific success indicators on which the campus will focus its efforts across the three priority areas.

The interim chief information officer stated that measurable milestones and target dates had been established for tasks that would be completed in the current year, but that implementation plans or dates for compliance in all sections of the ATI plan were not always considered in each annual reporting cycle.

An inadequate ATI status report increases the risk that campus ATI goals and objectives may not be reached in a timely manner.

**Recommendation 3**

We recommend that the campus amend future ATI annual reports to ensure that the campus status indicators reflect the actual progress toward ATI objectives.

**Campus Response**

We concur. The campus will establish status indicators, by December 31, 2014, that reflect actual progress toward ATI objectives.

**PROCUREMENT**

The campus did not require an AT assessment for all electronic and information technology (E&IT) purchases.
Specifically, we found that:

- The campus procurement process required an AT assessment only when purchases cost more than $15,000.
- Purchases made by the Aztec Shops, Ltd., did not include an AT assessment.

Executive Order 926, *The California State University Board of Trustees Policy on Disability Support and Accommodations*, dated December 20, 2004, states that when acquiring information technology, each campus shall acquire products that comply with applicable Section 508 provisions when such products are available in the commercial marketplace.

The director of contract and procurement management stated that the campus minimum purchase limit was implemented because of the high volume of technology purchases, and that each auxiliary organization had attended training about the ATI procurement requirements.

Lack of AT assessments for all E&IT purchases increases the risk that the campus ATI implementation plan will not be followed and campus goals and objectives will not be reached.

**Recommendation 4**

We recommend that the campus require an AT assessment for all E&IT purchases.

**Campus Response**

We concur. The campus will develop an AT assessment for E&IT purchases by November 30, 2014.

**INSTRUCTIONAL MATERIALS**

**MATERIALS ACCESSIBILITY**

The campus did not have a process in place to ensure that instructional materials for new courses were AT-compliant or to ensure that the course materials remained AT-compliant.

Coded memorandum AA-2013-03, *Accessible Technology Initiative*, dated January 29, 2013, states that the campus will submit an ATI annual report to the chancellor’s office each year that details campus progress towards accomplishing the ATI goals. Furthermore, the instructions for completing the annual report defines the established status level as one where the campus has a standard practice, procedures are formal, and documentation is complete.

The California State University (CSU) Accessible Technology Initiative website states in part that each campus will establish and maintain an instructional materials accessibility plan (IMAP) that addresses the specific actions to be taken by the campus for the following goals: incorporation of accessibility requirements for curricular review and approval; alignment of academic technology
resources to assist faculty in the creation of technology-enabled courses; and communication and training processes to educate students, staff, and faculty about the campus IMAP.

The associate vice president of faculty affairs stated that new course development happens over a period of time and that a method to check AT compliance before the new courses are scheduled had not yet been developed.

A lack of adequate procedures to confirm that instructional materials for courses are AT-compliant increases the risk that ATI goals will not be met.

**Recommendation 5**

We recommend that the campus develop and implement a process to ensure that instructional materials for new courses are AT compliant and that those course materials remain AT compliant.

**Campus Response**

We concur. The campus will develop and implement a process to ensure that instructional materials for new courses are AT compliant and that they remain AT compliant. This process will completed by December 31, 2014.

**AVAILABILITY OF ACCESSIBLE TECHNOLOGY**

AT equipment was not available to students during evening classes.

We found that the technology center that provided students with AT was closed after campus business hours, and students in evening courses did not have access to AT.

EO 926, *The California State University Board of Trustees Policy on Disability Support and Accommodations*, dated December 20, 2004, states in part that 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.

The director of library access services and human resources stated that the technology center was not staffed after campus business hours and that alternative methods to provide AT were being considered.

Lack of access to AT after standard business hours increases the risk that the campus ATI implementation plan may not achieve some objectives.

**Recommendation 6**

We recommend that the campus develop a method to make AT equipment accessible to students during evening classes.
Campus Response

We concur. The campus will develop a method to make AT equipment accessible to students during evening classes by November 30, 2014.

FACULTY TRAINING AND PARTICIPATION

The AT plan did not provide clear and measurable goals and objectives for faculty training and participation in the ATI.

We found that although voluntary training was available to the faculty, the campus did not have a method to determine or measure the extent of participation.

Coded memorandum AA-2013-03, Accessible Technology Initiative, dated January 29, 2013, states as a goal that the campus has implemented a broad-based ATI awareness campaign, supported by a comprehensive training infrastructure, to increase technological accessibility across the campus.

The associate vice president of academic affairs stated that campus training was available to faculty but that measurable milestones and target dates had not been established or monitored due to staffing changes.

Lack of faculty participation in training regarding the development of AT increases the risk that the campus AT implementation plan may not achieve some accessibility objectives and that campus goals for student accessibility may not be reached.

Recommendation 7

We recommend that the campus create clear and measurable goals and objectives for faculty training and participation in the AT initiative.

Campus Response

We concur. The campus will create measurable goals and objectives for faculty training and participation in the AT initiative by December 31, 2014.
## APPENDIX A: PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td>Elliot Hirshman</td>
<td>President</td>
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<tr>
<td>Ernest Arreola</td>
<td>Information Technology Services Manager, Associated Students</td>
</tr>
<tr>
<td>Sarah Baird</td>
<td>Director of Access Services and Human Resources, Library</td>
</tr>
<tr>
<td>Edith Benkov</td>
<td>Associate Vice President, Faculty Affairs</td>
</tr>
<tr>
<td>Reggie Blaylock</td>
<td>Associate Vice President, Student Affairs</td>
</tr>
<tr>
<td>Sandra Bullock</td>
<td>Employee Relations and Compliance Specialist</td>
</tr>
<tr>
<td>Carlos Careaga</td>
<td>Finance Director, Associated Students</td>
</tr>
<tr>
<td>Valerie Carter</td>
<td>Director, Audit and Tax</td>
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<tr>
<td>Tony Chung</td>
<td>Assistant Vice President, Student Affairs</td>
</tr>
<tr>
<td>James Frazee</td>
<td>Director, Instructional Technology Services</td>
</tr>
<tr>
<td>Chris Friedl</td>
<td>Programmer/Analyst</td>
</tr>
<tr>
<td>Cathy Garcia</td>
<td>Director, Contract and Procurement Management</td>
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<tr>
<td>Helen Haberman</td>
<td>Information Technology Consultant</td>
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<tr>
<td>Thom Harpole</td>
<td>Director, Office of Employee Relations and Compliance</td>
</tr>
<tr>
<td>Jahan Jamshidi</td>
<td>Director, Aztec Shops, Ltd.</td>
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<tr>
<td>Kathy LaMaster</td>
<td>Associate Vice President, Academic Affairs</td>
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<tr>
<td>Lorretta Leavitt</td>
<td>Associate Vice President, Financial Operations</td>
</tr>
<tr>
<td>Riny Ledgerwood</td>
<td>Director, Voice Services</td>
</tr>
<tr>
<td>Tom McCarron</td>
<td>Vice President, Business and Financial Affairs</td>
</tr>
<tr>
<td>Kent McKelvey</td>
<td>Interim Chief Information Officer, Enterprise Technology Services</td>
</tr>
<tr>
<td>Agnes Wong Nickerson</td>
<td>Associate Vice President, Financial Operations</td>
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<tr>
<td>Marc Pastor</td>
<td>Associate Director, Instructional Technology Services</td>
</tr>
<tr>
<td>Rachel Raynoha</td>
<td>Director, San Diego State University Research Foundation</td>
</tr>
<tr>
<td>Rich Rechif</td>
<td>Director, Finance and Accounting, San Diego State University Research Foundation</td>
</tr>
<tr>
<td>Jessica Rentto</td>
<td>Associate Vice President Administration, Business and Financial Affairs</td>
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<tr>
<td>Jon Rizzo</td>
<td>Instructional Materials Design Specialist</td>
</tr>
<tr>
<td>Pamela Starr</td>
<td>Director, Student Disability Services</td>
</tr>
<tr>
<td>Dawn Stoebe</td>
<td>Project Manager, Aztec Shops, Ltd.</td>
</tr>
<tr>
<td>Chris Xanthos</td>
<td>Associate Vice President, Business Operations</td>
</tr>
</tbody>
</table>
September 10, 2014

Mr. Larry Mandel  
Vice Chancellor and Chief Audit Officer  
Office of Audit and Advisory Services  
The California State University  
401 Golden Shore, 4th Floor  
Long Beach, CA 90802

Dear Mr. Mandel:

Attached is San Diego State University’s response to Audit Report 14-29, *Accessible Technology*. Documentation of policy and control changes will follow under separate cover.

Should you have any questions or require additional information, please contact Valerie Carter, Audit and Tax Director, at 619-594-5901.

Sincerely,

[Signature]

Tom McCarron  
Vice President for Business and Financial Affairs & CFO

Attachment

c: Elliot Hirshman, President  
Chris Xanthos, Associate Vice President for Business Operations & CIO  
Jessica Rentto, Associate Vice President, Administration  
Agnes Wong Nickerson, Associate Vice President, Financial Operations  
Reginald Blaylock, Associate Vice President, Student Affairs  
Edith Benkov, Associate Vice President, Faculty Affairs  
Kathy LaMaster, Associate Vice President, Academic Affairs  
Valerie Carter, Director, Audit and Tax
ACCESSIBLE TECHNOLOGY
SAN DIEGO STATE UNIVERSITY
Audit Report 14-29

GOVERNANCE

PROGRAM ADMINISTRATION

Recommendation 1

We recommend that the campus:

a. Clearly define the responsibilities and duties of the executive sponsor and ATI steering committee.

b. Strengthen the ATI committee’s oversight role in developing plans, setting priorities, developing timelines, and tracking or removing barriers to achieving program goals.

Campus Response

We concur. The campus will clearly define the responsibilities and duties of the executive sponsor and ATI steering committee. This also includes strengthening the ATI committee’s oversight role in developing plans, setting priorities, developing timelines, and tracking or removing barriers to achieving program goals. This will be completed by October 31, 2014.

ACCESSIBLE TECHNOLOGY PLAN

Recommendation 2

We recommend that the campus update the AT plan to provide clear and measurable steps for achieving goals listed in the current annual cycle as “Not Started” or “Initiated” and to describe how priorities will be determined.

Campus Response

We concur. The AT plan will be updated to include clear and measurable steps for achieving goals as well as describing how priorities will be determined. This will be completed by December 31, 2014.

ACCESSIBLE TECHNOLOGY REPORTING

Recommendation 3

We recommend that the campus amend future ATI annual reports to ensure that the campus status indicators reflect the actual progress toward ATI objectives.
Campus Response

We concur. The campus will establish status indicators, by December 31, 2014, that reflect actual progress toward ATI objectives.

PROCUREMENT

Recommendation 4

We recommend that the campus require an AT assessment for all E&IT purchases.

Campus Response

We concur. The campus will develop an AT assessment for E&IT purchases by November 30, 2014.

INSTRUCTIONAL MATERIALS

MATERIALS ACCESSIBILITY

Recommendation 5

We recommend that the campus develop and implement a process to ensure that instructional materials for new courses are AT compliant and that those course materials remain AT compliant.

Campus Response

We concur. The campus will develop and implement a process to ensure that instructional materials for new courses are AT compliant and that they remain AT compliant. This process will completed by December 31, 2014.

AVAILABILITY OF ACCESSIBLE TECHNOLOGY

Recommendation 6

We recommend that the campus develop a method to make AT equipment accessible to students during evening classes.

Campus Response

We concur. The campus will develop a method to make AT equipment accessible to students during evening classes by November 30, 2014.

FACULTY TRAINING AND PARTICIPATION

Recommendation 7

We recommend that the campus create clear and measurable goals and objectives for faculty training and participation in the AT initiative.
Campus Response

We concur. The campus will create measurable goals and objectives for faculty training and participation in the AT initiative by December 31, 2014.
October 6, 2014

MEMORANDUM

TO: Mr. Larry Mandel
Vice Chancellor and Chief Audit Officer

FROM: Timothy P. White
Chancellor

SUBJECT: Draft Final Report 14-29 on Accessible Technology,
San Diego State University

In response to your memorandum of October 6, 2014, I accept the response as submitted with the draft final report on Accessible Technology, San Diego State University.

TPW/amd