ACCESSIBLE TECHNOLOGY

CALIFORNIA STATE UNIVERSITY,
DOMINGUEZ HILLS

Audit Report 14-30
July 31, 2014

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ABBREVIATIONS

AA  Coded Memorandum Academic Affairs
ADA  Americans with Disabilities Act
CSU  California State University
AT  Accessible Technology
ATI  Accessible Technology Initiative
E&IT  Electronic and Information Technology
OAAS  Office of Audit and Advisory Services
SAM  State Administrative Manual
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 California State University, Dominguez Hills campus from April 7, 2014, through April 25, 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 April 25, 2014, taken as a whole, were sufficient to meet the objectives stated in the “Purpose” section of this report. Areas of concern include: governance, web accessibility, 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 [7]

Administration of the campus accessible technology initiative (ATI) program required improvement. Specifically, the responsibilities and duties of the executive sponsor and ATI steering committee were not clearly defined and documented; the ATI steering committee did not have an active role in developing plans, setting priorities, developing timelines, or tracking and removing barriers; and ATI steering committee meetings had not been documented since 2011. In addition, campus accessible technology policies and websites were not current. Further, the campus ATI implementation plan did not provide clear and measurable steps for achieving compliance in all sections.

WEB ACCESSIBILITY [10]

Campus web accessibility processes did not reflect current practices.

PROCUREMENT [11]

The campus electronic and information technology procurement plan had not been reviewed since 2009, did not contain documentation showing that milestones had been reached, and did not reflect current practices.
INSTRUCTIONAL MATERIALS [11]

Success indicators for instructional material goals in the ATI report did not accurately reflect campus practices.
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.
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 April 25, 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 required improvement.

We found that:

- The responsibilities and duties of the executive sponsor and ATI steering committee were not clearly defined and documented.

- The ATI steering committee did not have an active role in developing plans, setting priorities, developing timelines, or tracking and removing barriers.

- ATI steering committee meetings had not been documented since 2011.

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 composed of all key stakeholder groups. It further states that the campus executive sponsor, working with the campus ATI steering committee, 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 vice president of information technology/chief information officer (CIO) stated that roles and duties became less defined when several key members, including the executive sponsor, left the university. He further stated that because of the transition, meetings became less frequent and were not formally documented.

Inadequate administration of the ATI program increases the risk that the program may not be run effectively and equal access may not be provided.

Recommendation 1

We recommend that the campus:

a. Define and document the responsibilities and duties of the executive sponsor and ATI steering committee.

b. Strengthen the ATI steering committee’s role in developing plans, setting priorities, developing timelines, and tracking or removing barriers.

c. Document ATI steering committee meetings.
Campus Response

We concur.

a. The responsibilities and duties of the executive sponsor and ATI steering committee will be defined and documented by November 2014.

b. The ATI steering committee’s role in developing plans, setting priorities, developing timelines, and tracking or removing barriers will be strengthened by November 2014.

c. ATI steering committee meetings will be documented by November 2014.

POLICIES AND ACCESSIBLE TECHNOLOGY INFORMATION

Campus accessible technology (AT) policies and websites were not current.

We found that:

- Campus AT policies did not include an approval signature or implementation and review dates.
- Campus AT policies had not been updated since the 2009/10 school year, and two AT-related webpages (titled ATI at CSUDH and Web Accessibility) had not been updated since 2010.
- Campus websites contained conflicting information regarding the AT complaint process: The disabled student services website contained current information, but the student website contained outdated information and provided a link to the process from 1978.
- The human resources website did not include information about AT or the complaint process for employees.
- The campus website did not include information about the AT complaint process for non-union employees or visitors.

State Administrative Manual (SAM) §20050 indicates that nonexistent or outdated policies are a symptom of a control deficiency.

Executive Order 926, the California State University Board of Trustees Policy on Disability Support and Accommodations, dated December 20, 2004, states that each campus shall have a complaint procedure in place to handle allegations of discrimination/harassment from applicants and independent contractors.

Code of Federal Regulations Title 28, Part 35, Nondiscrimination on the Basis of Disability in State and Local Government Services, §35.107, effective January 26, 1992, states that a public entity that employs 50 or more people shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints.
The vice president of information technology/CIO stated that the campus focused its limited resources on other ATI goals once policies and webpages were established.

Outdated or nonexistent policies and websites increase the risk that the campus ATI implementation plan will not be followed and campus goals and objectives may not be reached.

**Recommendation 2**

We recommend that the campus:

a. Include approval signatures and implementation and review dates on all AT policies.

b. Update AT policies and related webpages in a timely manner.

c. Update campus websites so that information regarding the AT complaint process is current.

d. Update the human resources website to include information about AT and the complaint process for employees.

e. Update the campus website to include information about the AT complaint process for non-union employees or visitors.

**Campus Response**

We concur.

a. Approval signatures and implementation and review dates will be included on all AT policies by December 2014.

b. AT policies and related webpages will be updated in a timely manner by December 2014.

c. Campus websites will be updated so that information regarding the AT complaint process is current by December 2014.

d. The human resources website will be updated to include information about AT and the complaint process for employees by December 2014.

e. The campus website will be updated to include information about the AT complaint process for non-union employees or visitors by December 2014.

**ACCESSIBLE TECHNOLOGY PLAN**

The campus ATI implementation plan did not provide clear and measurable steps for achieving compliance in all sections.
Specifically, we found that the plan did not set measurable milestones or target dates and did not reflect on activities that were not being addressed.

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 vice president of information technology/CIO stated that the campus was following the CSU ATI criteria but that measurable milestones and target dates were not monitored due to staff turnover.

Lack of targets or measurable milestones increases the risk that the campus ATI implementation plan will not be followed and campus goals and objectives will not be reached.

Recommendation 3

We recommend that the campus revise its ATI implementation plan to include clear and measurable steps for achieving compliance in all sections.

Campus Response

We concur. The ATI implementation plan will be revised to include clear and measurable steps for achieving compliance in all sections by December 2014.

WEB ACCESSIBILITY

Campus web accessibility processes did not reflect current practices.

Specifically, we found that:

- Web accessibility policy goals and milestones ended in 2008.
- The campus statement on web accessibility required that all official websites include an accessibility statement on the top-level page, but this was no longer campus policy and was not being implemented.

SAM §20050 indicates that nonexistent or outdated policies are a symptom of a control deficiency.

The vice president of information technology/CIO stated that documented processes were not updated to reflect current processes and goals due to staffing turnover and limited resources. He further stated that he was unaware of the requirements set forth in the web accessibility statement.

Outdated processes increase 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 update its web accessibility processes to reflect current practices.

Campus Response

We concur. The campus will update its web accessibility processes to reflect current practices by December 2014.

PROCUREMENT

The campus electronic and information technology (E&IT) procurement plan had not been reviewed since 2009, did not contain documentation showing that milestones had been reached, and did not reflect current practices.

For example, we found that the plan required periodic verification that the proper Section 508 documentation had been completed and included in the procurement files, but the campus could not demonstrate that these reviews were being conducted.

SAM §20050 indicates that nonexistent or outdated policies are a symptom of a control deficiency.

The director of procurement and contracts stated that the policies were outdated due to recent staffing changes in the procurement department.

Outdated processes increase the risk that the campus ATI implementation plan will not be followed and campus goals and objectives will not be reached.

Recommendation 5

We recommend that the campus review and update the E&IT procurement plan to contain documentation showing that milestones have been reached and to reflect current practices.

Campus Response

We concur. The campus will review and update the E&IT procurement plan to contain documentation showing that milestones have been reached and to reflect current practices by December 2014.

INSTRUCTIONAL MATERIALS

Success indicators for instructional material goals in the ATI report did not accurately reflect campus practices.
Specifically, we found that:

- The campus’ informal practices established to ensure that instructional materials were accessible were not reflected in the 2012/13 Annual Accessibility Report.

- The 2012/13 report indicated that the campus had established milestones for timely completion of instructional material goals and had implemented a system to track these milestones, but the milestones had not been updated since 2010 and there was no documentation to demonstrate that the campus had implemented a system to track them.

Coded memorandum AA-2013-03 states that the campus will submit an ATI Annual Report to the chancellor’s office each year that details campus progress toward accomplishing the ATI goals. Furthermore, the instructions for completing the annual report define the established status level as the campus has a standard practice, procedures are formal, and documentation is complete.

The vice president of information technology stated that the committee had recently experienced turnover due to numerous staffing changes and that the new members thought that procedures listed in the plan with a status of “established” did not require further attention.

Inaccurate status indicators on annual reports increases the risk that the campus ATI implementation plan is not being accurately reported and campus goals and objectives may not be reached.

**Recommendation 6**

We recommend that the campus update success indicators for instructional material goals in the ATI report to accurately reflect campus practices.

**Campus Response**

We concur. The campus will update success indicators for instructional material goals in the ATI report to accurately reflect campus practices by December 2014.
APPENDIX A: PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td>Willie Hagan</td>
<td>President</td>
</tr>
<tr>
<td>Bill Chang</td>
<td>Director of Enterprise Applications, Information Technology</td>
</tr>
<tr>
<td>Lawrence Kimaara</td>
<td>Manager, Business Process Management</td>
</tr>
<tr>
<td>Robert Lovitt</td>
<td>Interim Vice President, Business and Finance (At time of review)</td>
</tr>
<tr>
<td>Robert Fenning</td>
<td>Vice President, Administration and Finance (Currently)</td>
</tr>
<tr>
<td>Wei Ma</td>
<td>Electronic Resources Management Librarian and Reference, Library</td>
</tr>
<tr>
<td>Chris Manriquez</td>
<td>Vice President/Chief Information Officer, Information Technology</td>
</tr>
<tr>
<td>Clarence Martin</td>
<td>Associate Vice President Human Resources</td>
</tr>
<tr>
<td>Jerry Moore</td>
<td>Professor Anthropology Department, Senate Chair</td>
</tr>
<tr>
<td>Naomi Moy</td>
<td>Director, Reference Librarian, Reference Services</td>
</tr>
<tr>
<td>Cecilia Ortiz</td>
<td>Director, Donald P. and Katherine B. Loker University Student Union, Inc.</td>
</tr>
<tr>
<td>Marci Payne</td>
<td>Project Management Officer, Information Technology</td>
</tr>
<tr>
<td>Tak Yee Poon</td>
<td>University Webmaster, Enterprise Applications</td>
</tr>
<tr>
<td>Francisco Quinonez</td>
<td>Director, Procurement and Contracts</td>
</tr>
<tr>
<td>Statham Russel</td>
<td>Director of Business and Finance, California State University, Dominguez Hills Foundation</td>
</tr>
<tr>
<td>Mark Seigle</td>
<td>Emeritus Staff Member</td>
</tr>
<tr>
<td>Rasheedah Shakoor</td>
<td>Executive Director, Associated Students, Inc.</td>
</tr>
<tr>
<td>Patricia Wells</td>
<td>Director, Disabled Student Services</td>
</tr>
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August 25, 2014

Mr. Larry Mandel
University Auditor
The California State University
401 Golden Shore, 4th Floor
Long Beach, CA 90802-4210

Dear Mr. Mandel:

Enclosed, please find California State University, Dominguez Hills’ responses to the Accessible Technology Audit Report 14-30, dated July 17, 2014. The campus is committed to addressing and resolving the issues identified in the audit report.

If you have any questions or would like additional information, please contact me.

Sincerely,

[Signature]

Robert Fenning
Vice President
Administration and Finance

Enclosure (1)

c: Willie J. Hagan, President
   Lawrence Kimaara, Manager, Business Process Management
ACCESSIBLE TECHNOLOGY

CALIFORNIA STATE UNIVERSITY,
DOMINGUEZ HILLS

Audit Report 14-30

GOVERNANCE

PROGRAM ADMINISTRATION

Recommendation 1

We recommend that the campus:

a. Define and document the responsibilities and duties of the executive sponsor and ATI steering committee.

b. Strengthen the ATI steering committee’s role in developing plans, setting priorities, developing timelines, and tracking or removing barriers.

c. Document ATI steering committee meetings.

Campus Response

a. We concur. The responsibilities and duties of the executive sponsor and ATI steering committee shall be defined and documented by November 2014.

b. We concur. The ATI steering committee’s role in developing plans, setting priorities, developing timelines, and tracking or removing barriers shall be strengthened by November 2014.

c. We concur. ATI steering committee meetings shall be documented by November 2014.

POLICIES AND ACCESSIBLE TECHNOLOGY INFORMATION

Recommendation 2

We recommend that the campus:

a. Include approval signatures and implementation and review dates on all AT policies.

b. Update AT policies and related webpages in a timely manner.

c. Update campus websites so that information regarding the AT complaint process is current.

d. Update the human resources website to include information about AT and the complaint process for employees.
e. Update the campus website to include information about the AT complaint process for non-union employees or visitors.

Campus Response

a. We concur. Approval signatures and implementation and review dates shall be included on all AT policies by December 2014.

b. We concur. AT policies and related webpages shall be updated in a timely manner by December 2014.

c. We concur. Campus websites shall be updated so that information regarding the AT complaint process is current, by December 2014.

d. We concur. The human resources website shall be updated to include information about AT and the complaint process for employees, by December 2014.

e. We concur. The campus website shall be updated to include information about the AT complaint process for non-union employees or visitors, by December 2014.

ACCESSIBLE TECHNOLOGY PLAN

Recommendation 3

We recommend that the campus revise its ATI implementation plan to include clear and measurable steps for achieving compliance in all sections.

Campus Response

We concur. The ATI implementation plan shall be revised to include clear and measurable steps for achieving compliance in all sections, by December 2014.

WEB ACCESSIBILITY

Recommendation 4

We recommend that the campus update its web accessibility processes to reflect current practices.

Campus Response

We concur. The campus shall update its web accessibility processes to reflect current practices, by December 2014.
PROCUREMENT

Recommendation 5

We recommend that the campus review and update the E&IT procurement plan to contain documentation showing that milestones have been reached and to reflect current practices.

Campus Response

We concur. The campus shall review and update the E&IT procurement plan to contain documentation showing that milestones have been reached and to reflect current practices by December 2014.

INSTRUCTIONAL MATERIALS

Recommendation 6

We recommend that the campus update success indicators for instructional material goals in the ATI report to accurately reflect campus practices.

Campus Response

We concur. The campus shall update success indicators for instructional material goals in the ATI report to accurately reflect campus practices, by December 2014.
October 6, 2014

MEMORANDUM

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

FROM: Timothy P. White
Chancellor

SUBJECT: Draft Final Report 14-30 on Accessible Technology,
California State University, Dominguez Hills

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

TPW/amd