ACCESSIBLE TECHNOLOGY
CALIFORNIA STATE POLYTECHNIC UNIVERSITY,
POMONA

Audit Report 14-31
July 24, 2014

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ABBREVIATIONS

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<th>Full Form</th>
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<tr>
<td>AA</td>
<td>Academic Affairs</td>
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<tr>
<td>ADA</td>
<td>Americans with Disabilities Act</td>
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<tr>
<td>ASI</td>
<td>Associated Students Incorporated</td>
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<td>AT</td>
<td>Accessible Technology</td>
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<tr>
<td>ATI</td>
<td>Accessible Technology Initiative</td>
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<tr>
<td>CIO</td>
<td>Chief Information Officer</td>
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<tr>
<td>CSU</td>
<td>California State University</td>
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<tr>
<td>E&amp;IT</td>
<td>Electronic and Information Technology</td>
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<tr>
<td>EO</td>
<td>Executive Order</td>
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<tr>
<td>Foundation</td>
<td>Cal Poly Pomona Foundation, Inc.</td>
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<tr>
<td>I&amp;IT</td>
<td>Instructional and Information Technology</td>
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<td>OAAS</td>
<td>Office of Audit and Advisory Services</td>
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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 Polytechnic University, Pomona campus from April 21, 2014, through May 16, 2014, and audited the procedures in effect at that time.

In our opinion, due to the effect of the weaknesses described below, the fiscal, operational, and administrative controls for AT activities as of May 16, 2014, taken as a whole, were not sufficient to meet the objectives stated in the “Purpose” section of this report. Areas of major concern include: governance, web accessibility, and procurement.

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]

The Accessible Technology Initiative (ATI) steering committee did not include a student representative. Additionally, the campus had not developed formal policies and procedures for reviewing websites for accessibility. Also, the campus 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. Further, status levels for success indicators in the AT status report did not always match status levels in the AT plan. In addition, the AT plan did not provide clear and measurable objectives for faculty, staff, and procurement participation in accessibility training.

WEB ACCESSIBILITY [10]

Campus reviews of website accessibility for Section 508 compliance required improvement. Specifically, the AT plan did not include reviews of faculty websites and other non-administrative websites. In addition, the campus, Associated Students, Inc. (ASI), and Cal Poly Pomona Foundation, Inc. (Foundation) did not maintain evidence that Section 508 compliance scan reports were reviewed on a periodic basis and that issues identified were followed up on in a timely manner. Also, the campus and ASI did not have a process in place to perform manual checks on documents added to websites that were not analyzed as part of Section 508 compliance scans.
PROCUREMENT [12]

The campus procurement process for electronic and information technology (E&IT) purchases required improvement. Specifically, ASI procurement policies and procedures did not specifically address AT requirements; E&IT purchases made from grant funds were not reviewed by the Foundation or by the campus ATI coordinator for compliance with accessibility requirements; and the Foundation E&IT procurement guidelines had established a limit of $5,000 or more for hardware purchases and $1,000 or more for software purchases, which was not consistent with systemwide guidance.
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 May 16, 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

The Accessible Technology Initiative (ATI) steering committee did not include a student representative.

Executive Order (EO) 926 states that each campus shall establish a standing committee on disability access and compliance involving the Americans with Disabilities Act (ADA) compliance officer/coordinator and representatives from academic affairs, business and finance, human resources, information technology, parking, procurement, student services, one student representative appointed by Associated Students, Inc. (ASI), one faculty member appointed by the Academic Senate, and one staff representative.

The interim associate chief information officer (CIO) of instructional and information technology (I&IT) projects and support/accessible technology (AT) coordinator stated that the campus missed the requirement added in 2013 and thought that it had satisfied the requirement because an ASI representative was on the steering committee.

Lack of student representation on the ATI steering committee increases the risk that the program will not run effectively and equal access will not be provided.

Recommendation 1

We recommend that the campus, in conjunction with ASI, appoint one student representative to the ATI steering committee.

Campus Response

We concur. We will appoint one student representative to the ATI steering committee.

Timeline: January 24, 2015

ACCESSIBILITY GUIDELINES

The campus had not developed formal policies and procedures for reviewing websites for accessibility.

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

EO 926 states that each campus shall develop and maintain overall procedures for ensuring compliance with applicable federal and state laws and regulations related to accessibility.
Coded memorandum Academic Affairs (AA) 2013-03, Accessible Technology Initiative, dated January 29, 2013, states as a goal that campuses are required to identify and repair or replace inaccessible websites, web applications, and digital content.

The interim associate CIO of I&IT projects and support/AT coordinator stated that the campus is developing web processes as part of its current web refresh project, and these processes had not yet been formalized.

Inadequate web accessibility policies increase the risk that the campus AT plan will not be followed and campus goals and objectives will not be reached.

**Recommendation 2**

We recommend that the campus develop formal policies and procedures for reviewing websites for accessibility.

**Campus Response**

We concur. We will develop formal procedures for reviewing websites for accessibility.

**Timeline: January 24, 2015**

**ACCESSIBLE TECHNOLOGY PLAN**

The campus 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 some ATI goals require investments and changes to business procedures that will require time to deploy. It further states that it is critical that the California State University (CSU) document the substantive steps that have been taken over time to remove technology accessibility barriers. It also states that each year the campus will review and update the AT 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 associate CIO of I&IT projects and support/AT coordinator stated that the campus recently adopted the new CSU format for campus AT plans. She further stated that the campus AT plan had not been fully updated with all relevant information.

Lack of measurable milestones or specific targets and lack of prioritization of projects and activities for each area increases the risk that the campus AT plan may not achieve some objectives, and accordingly, that campus goals and objectives may not be reached in a timely manner.
**Recommendation 3**

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

Timeline: January 24, 2015

**ACCESSIBLE TECHNOLOGY REPORTING**

Status levels for success indicators in the AT status report did not always match status levels in the AT plan.

Specifically, we found that two success indicators that were listed as “Defined” in the annual report were listed as “Established” in the procurement section of the AT plan.

Coded memorandum AA-2013-03, *Accessible Technology Initiative*, dated January 29, 2013, states that when completing the annual report each year, campuses will report on the status of all goals and success indicators since campus progress may result from systemwide and campus-level activities.

The interim associate CIO of I&IT projects and support/AT coordinator stated that the status level differences were due to error.

Inaccurate annual reports increase the risk that the AT plan will not be followed and campus goals and objectives will not be reached.

**Recommendation 4**

We recommend that the campus evaluate the success indicators in the AT plan and adjust the AT status report accordingly.

**Campus Response**

We concur. We will evaluate the success indicators in the AT plan and adjust the AT status report accordingly.

Timeline: January 24, 2015
ACCESSIBLE TECHNOLOGY TRAINING AND PARTICIPATION

The AT plan did not provide clear and measurable objectives for faculty, staff, and procurement participation in accessibility training.

Coded memorandum AA 2013-03, Accessible Technology Initiative, dated January 29, 2013, states as a goal that the campus community is aware of Section 508 guidelines to make web-based information available to everyone regardless of disability. Another goal states that all parties involved in electronic and information technology (E&IT) procurement have been trained, and a continual training program is in place. The coded memorandum also states as a goal that the campus has implemented a broad-based accessible technology initiative (ATI) awareness campaign supported by a comprehensive training infrastructure to increase technological accessibility across the campus.

The interim associate CIO of I&IT projects and support/AT coordinator stated that ATI training was decentralized to the related responsible operational areas, and as a result, was inconsistently implemented and tracked.

Inadequate faculty, staff, and procurement participation in accessibility training increases the risk that the campus may not achieve all AT program goals and objectives.

Recommendation 5

We recommend that the campus create clear and measurable objectives for faculty, staff, and procurement participation in accessibility training.

Campus Response

We concur. We will create clear and measurable objectives for faculty, staff, and procurement participation in accessibility training.

Timeline: January 24, 2015

WEB ACCESSIBILITY

Campus reviews of website accessibility for Section 508 compliance required improvement.

Specifically, we found that:

- The AT plan did not include reviews of faculty websites and other non-administrative websites.

- The campus, ASI, and Cal Poly Pomona Foundation, Inc. (Foundation) did not maintain evidence that Section 508 compliance scan reports were reviewed on a periodic basis and that issues identified were followed up on in a timely manner.
The campus and ASI did not have a process in place to perform manual checks on documents added to websites that were not analyzed as part of Section 508 compliance scans.

Coded memorandum AA 2013-03, Accessible Technology Initiative, dated January 29, 2013, states as a goal that the web accessibility evaluation process includes the identification and repair or replacement of inaccessible websites, web applications, and digital content.

The interim associate CIO of I&IT projects and support/AT coordinator stated that as part of the campus’ current web refresh project, the campus is developing related web processes, but they have not yet been formalized.

Inadequate reviews of website accessibility for Section 508 compliance increases the risk that campus websites will be inaccessible.

**Recommendation 6**

We recommend that:

a. The campus revise the AT plan to include reviews of faculty websites and other non-administrative websites.

b. The campus, ASI, and Foundation maintain evidence that Section 508 compliance scan reports are reviewed on a periodic basis and that issues identified are followed up on in a timely manner.

c. The campus and ASI develop and implement a process to perform manual checks on documents added to websites.

**Campus Response**

We concur.

a. We will revise the AT plan to include reviews of faculty websites and other non-administrative websites.

b. The campus, ASI, and Foundation will maintain evidence that the compliance scan reports are reviewed on a periodic basis and that issues identified are followed up in a timely manner.

c. The campus and ASI will develop and implement a process to perform manual checks on documents added to websites.

Timeline: January 24, 2015
PROCUREMENT

The campus procurement process for E&IT purchases required improvement.

We found that:

- ASI procurement policies and procedures did not specifically address AT requirements.
- E&IT purchases made from grant funds were not reviewed by the Foundation or by the campus ATI coordinator for compliance with accessibility requirements.
- The Foundation E&IT procurement guidelines had established a limit of $5,000 or more for hardware purchases and $1,000 or more for software purchases, which was not consistent with systemwide guidance.

EO 926 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 interim associate CIO of I&IT projects and support/AT coordinator stated that E&IT procurement was decentralized on campus, based on the funding source, and as a result, ATI procedures were not consistently implemented.

Inadequate policies and accessibility assessments increase the risk that the campus AT plan will not be followed and campus goals and objectives will not be reached.

**Recommendation 7**

We recommend that:

a. ASI revise its procurement policies and procedures to specifically address AT requirements.

b. The Foundation and campus review all E&IT purchases made from grant funds for compliance with accessibility requirements.

c. The Foundation revise its procurement guidelines to align with systemwide guidance.

**Campus Response**

We concur.

a. ASI will revise its procurement policies and procedures to specifically address AT requirements.

b. The Foundation and the campus will review all E&IT purchases made from grant funds for compliance with accessibility requirements.
c. The Foundation will revise its procurement guidelines to align with systemwide guidance.

Timeline: January 24, 2015
## APPENDIX A: PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td>J. Michael Ortiz</td>
<td>President</td>
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<tr>
<td>Cora Culla</td>
<td>Executive Director, Associated Students, Inc. (ASI)</td>
</tr>
<tr>
<td>Suzanne Donnelly</td>
<td>Associate Director, Bronco Bookstore</td>
</tr>
<tr>
<td>Kenneth Flores</td>
<td>Interactive Content Producer, ASI</td>
</tr>
<tr>
<td>Steven N. Garcia</td>
<td>Vice President, Administrative Affairs and Chief Financial Officer</td>
</tr>
<tr>
<td>Debra Garr</td>
<td>Procurement and Asset Management Lead</td>
</tr>
<tr>
<td>Carol Gonzales</td>
<td>Interim Associate Chief Information Officer for Instructional and Information Technology Projects and Support/ Accessible Technology Coordinator</td>
</tr>
<tr>
<td>Jenesie Hardyman</td>
<td>Information Technology Coordinator</td>
</tr>
<tr>
<td>Alex Hernandez</td>
<td>Webmaster, Foundation</td>
</tr>
<tr>
<td>Darwin Labordo</td>
<td>Associate Vice President/Associate Chief Financial Officer</td>
</tr>
<tr>
<td>John McGunthry</td>
<td>Chief Information Officer</td>
</tr>
<tr>
<td>Carmen Munoz-Silva</td>
<td>Director, Diversity and Compliance</td>
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<tr>
<td>Cathy Neale</td>
<td>Marketing and Public Relations Manager, ASI</td>
</tr>
<tr>
<td>Tracee Passeggi</td>
<td>Interim Director, Disability Resource Center</td>
</tr>
<tr>
<td>Becky Pepping</td>
<td>Buyer III, Procurement and Support Services</td>
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<tr>
<td>David Prenovost</td>
<td>Chief Financial Officer, Foundation</td>
</tr>
<tr>
<td>Kathleen Prunty</td>
<td>Director, Procurement and Support Services</td>
</tr>
<tr>
<td>Jayson Smith</td>
<td>Assistant Professor, Biological Sciences Department</td>
</tr>
<tr>
<td>Randall Townsend</td>
<td>Information Technology Director, Foundation</td>
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August 29, 2014

Mr. Larry Mandel, Vice Chancellor and
Chief Audit Officer
The California State University
401 Golden Shore, Suite 210
Long Beach, CA 90802

Dear Mr. Mandel:

Subject: Campus Response to Recommendations of Accessible Technology Audit 14-31

Enclosed is California State Polytechnic's campus response to the Accessible Technology Audit 14-31. We appreciate the effort you and your staff have made to indicate areas where our procedures or internal controls could be strengthened. We will take the necessary actions to address the report’s recommendations.

Please direct questions concerning the response to Darwin Labordo, Associate Vice President of Finance and Administrative Services and Associate Chief Financial Officer at 909-869-2008 or dlabordo@csupomona.edu.

Sincerely,

Steven N. Garcia,
Vice President for Administrative Affairs and Chief Financial Officer

Cc: J. Michael Ortiz, President
    Cora Culla, Executive Director, ASI
    Marten denBoer, Provost and Vice President, Academic Affairs
    Darwin Labordo, Associate Vice President, Finance & Administrative Services
    John McGuthry, Vice President and CIO, Instructional & Information Technology
    David Prenovost, CFO, Foundation Financial Services, Cal Poly Foundation
    G. Paul Storey, Executive Director, Cal Poly Foundation
    Joice Xiong, University Auditor

Enclosure
ACCESSIBLE TECHNOLOGY

CALIFORNIA STATE POLYTECHNIC UNIVERSITY,
POMONA

Audit Report 14-31

GOVERNANCE

PROGRAM ADMINISTRATION

Recommendation 1

We recommend that the campus, in conjunction with ASI, appoint one student representative to the ATI steering committee.

Campus Response

We concur. We will appoint one student representative to the ATI steering committee.

Timeline: January 24, 2015

ACCESSIBILITY GUIDELINES

Recommendation 2

We recommend that the campus develop formal policies and procedures for reviewing websites for accessibility.

Campus Response

We concur. We will develop formal procedures for reviewing websites for accessibility.

Timeline: January 24, 2015

ACCESSIBLE TECHNOLOGY PLAN

Recommendation 3

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

Timeline: January 24, 2015

ACCESSIBLE TECHNOLOGY REPORTING

Recommendation 4

We recommend that the campus evaluate the success indicators in the AT plan and adjust the AT status report accordingly.

Campus Response

We concur. We will evaluate the success indicators in the AT plan and adjust the AT status report accordingly.

Timeline: January 24, 2015

ACCESSIBLE TECHNOLOGY TRAINING AND PARTICIPATION

Recommendation 5

We recommend that the campus create clear and measurable objectives for faculty, staff, and procurement participation in accessibility training.

Campus Response

We concur. We will create clear and measurable objectives for faculty, staff, and procurement participation in accessibility training.

Timeline: January 24, 2015

WEB ACCESSIBILITY

Recommendation 6

We recommend that:

a. The campus revise the AT plan to include reviews of faculty websites and other non-administrative websites.

b. The campus, ASI, and Foundation maintain evidence that Section 508 compliance scan reports are reviewed on a periodic basis and that issues identified are followed up on in a timely manner.
c. The campus and ASI develop and implement a process to perform manual checks on documents added to websites.

**Campus Response**

We concur.

a. We will revise the AT plan to include reviews of faculty websites and other non-administrative websites.

b. The campus, ASI and Foundation will maintain evidence that the compliance scan reports are reviewed on a periodic basis and that issues identified are followed up in a timely manner.

c. The campus and ASI will develop and implement a process to perform manual checks on documents added to websites.

**Timeline:** January 24, 2015

**PROCUREMENT**

**Recommendation 7**

We recommend that:

a. ASI revise its procurement policies and procedures to specifically address AT requirements.

b. The Foundation and campus review all E&IT purchases made from grant funds for compliance with accessibility requirements.

c. The Foundation revise its procurement guidelines to align with systemwide guidance.

**Campus Response**

We concur.

a. ASI will revise its procurement policies and procedures to specifically address AT requirements.

b. The Foundation and the campus will review all E&IT purchases made from grant funds for compliance with accessibility requirements.

c. The Foundation will revise its procurement guidelines to align with systemwide guidance.

**Timeline:** January 24, 2015
October 6, 2014

MEMORANDUM

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

FROM: Timothy P. White
       Chancellor

SUBJECT: Draft Final Report 14-31 on Accessible Technology,
         California State Polytechnic University, Pomona

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
Polytechnic University, Pomona.

TPW/amd