ACCESSIBLE TECHNOLOGY

CALIFORNIA STATE UNIVERSITY,
LOS ANGELES

Audit Report 14-33
October 3, 2014

Members, Committee on Audit

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BOARD OF TRUSTEES
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ABBREVIATIONS

AA  Academic Affairs
ADA  Americans with Disabilities Act
AT  Accessible Technology
ATI  Accessible Technology Initiative
CSU  California State University
CTO  Chief Technology Officer
E&IT  Electronic and Information Technology
EO  Executive Order
ITS  Information Technology Services
OAAS  Office of Audit and Advisory Services
USU  University Student Union
VP  Vice President
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, Los Angeles campus from June 23, 2014, through July 11, 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 July 11, 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, 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 campus accessible technology initiative (ATI) plan did not provide clear and measurable steps for achieving the goals listed in the current annual cycle, particularly those with a status level of “Not Started” or “Initiated,” and did not describe how priorities were determined. In addition, success indicators in the campus ATI annual report did not coincide with those in the campus ATI plan. Additionally, the campus ATI website did not include current information related to the ATI project plan, timeline, committee members, and procurement procedures.

WEB ACCESSIBILITY [9]

Campus reviews of website accessibility for Section 508 compliance required improvement. Specifically, Section 508 compliance scans did not have the capability to analyze content within documents added to websites for compliance, and the campus and auxiliaries did not have a process in place to perform manual accessibility reviews of added documents.

PROCUREMENT [9]

The campus procurement process for electronic and information technology (E&IT) purchases required improvement. For example, the CSULA Foundation and University Student Union procurement policies and procedures did not specifically address AT requirements. Additionally, the campus and auxiliary...
process for E&IT purchases only required accessibility assessment of technology purchases over $15,000, which is not consistent with 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 July 11, 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

ACCESSIBLE TECHNOLOGY PLAN

The campus accessible technology initiative (ATI) plan did not provide clear and measurable steps for achieving the goals listed in the current annual cycle, particularly those with a status level of “Not Started” or “Initiated,” and did not describe how priorities were determined.

Coded memorandum Academic Affairs (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 vice president (VP) of student affairs and the VP and chief technology officer (CTO) for information technology services (ITS) stated that the campus had adopted the accessible technology annual report of progress as the campus ATI plan, and it was reviewed and updated on an annual basis. They further stated that the plan needed additional refinement to include the noted information.

Lack of measurable milestones or target dates for achieving compliance increases the risk that the campus ATI plan may not achieve some objectives for years, and accordingly, that campus goals and objectives may not be reached in a timely manner.

Recommendation 1

We recommend that the campus update the ATI plan to provide clear and measurable steps for achieving goals listed in the current annual cycle and to describe how priorities will be determined.

Campus Response

The campus will update the ATI plan to provide clear and measurable steps for achieving goals listed in the current annual cycle and describe how priorities will be determined by December 31, 2014.

ACCESSIBLE TECHNOLOGY REPORTING

Success indicators in the campus ATI annual report did not coincide with those in the campus ATI plan.

Coded memorandum AA-2013-03, Accessible Technology Initiative, dated January 29, 2013, states that campuses will submit an ATI annual report to the chancellor’s office each year that details campus progress toward accomplishing the ATI goals.
The VP of student affairs and the VP/CTO for ITS stated that the noted success indicators did not coincide with the key plan listed in the report due to oversight.

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

**Recommendation 2**

We recommend that the campus amend future ATI annual reports to ensure that the success indicators coincide with those in the campus ATI plan.

**Campus Response**

For future ATI annual reports, the campus will ensure that success indicators coincide with the campus ATI plan. This will be reflected in the next annual report to be submitted by November 14, 2014.

**ACCESSIBLE TECHNOLOGY WEBSITE**

The campus ATI website did not include current information related to the ATI project plan, timeline, committee members, and procurement procedures.

Executive Order (EO) 926 states that continuing compliance with the various federal and state disability laws rests upon the assumption that current compliance efforts are retained and periodically updated to respond to changing conditions and to address unforeseen events as they occur.

The VP of student affairs and the VP/CTO for ITS stated that the campus was converting all websites to a new content management system, and content on the ATI website would be updated as part of that process.

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

**Recommendation 3**

We recommend that the campus update the ATI website with current information related to the ATI project plan, timeline, committee members, and procurement procedures.

**Campus Response**

The ATI website will be converted to the new content management system by December 31, 2014, that will include a posting of the ATI project plan, the timeline, committee members, and procurement procedures.
WEB ACCESSIBILITY

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

Specifically, we found that Section 508 compliance scans did not have the capability to analyze content within documents added to websites for compliance, and the campus and auxiliaries did not have a process in place to manually perform accessibility reviews of added documents.

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 director of ITS and compliance stated that in lieu of performing manual checks over documents added to websites for accessibility, the campus confirms that a link to the appropriate reader has been provided.

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

Recommendation 4

We recommend that the campus and auxiliaries develop and implement a process to manually perform accessibility reviews of documents added to websites.

Campus Response

The campus will develop, document, and implement a process to manually perform accessibility reviews of documents added to websites by December 31, 2014.

PROCUREMENT

The campus procurement process for electronic and information technology (E&IT) purchases required improvement.

We found that:

- The CSULA Foundation and University Student Union (USU) procurement policies and procedures did not specifically address AT requirements.

- The campus and auxiliary process for E&IT purchases only required accessibility assessment of technology purchases of more than $15,000, which is not consistent with 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 director of procurement and contracts stated that auxiliary policies and procedures needed additional refinement to address ATI requirements. Additionally, he stated that the campus was aware that the $15,000 threshold was no longer in effect and was working on updating the procurement process to reflect the change.

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

**Recommendation 5**

We recommend that:

a. The Foundation and USU revise their procurement policies and procedures to specifically address ATI requirements.

b. The campus require an ATI assessment for all E&IT purchases.

**Campus Response**

a. The Foundation and USU procurement policies and procedures will be revised to reference the campus procedures that address ATI requirements. Date of implementation will be December 31, 2014.

b. The campus will develop an ATI assessment for E&IT purchases by December 31, 2014.
## APPENDIX A:
### PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td>William A. Covino</td>
<td>President</td>
</tr>
<tr>
<td>Lisa Chavez</td>
<td>Vice President, Administration and Chief Financial Officer</td>
</tr>
<tr>
<td>Kimberly Clapp</td>
<td>Director, Office for Students with Disabilities</td>
</tr>
<tr>
<td>Janet Dial</td>
<td>Vice President, University Advancement</td>
</tr>
<tr>
<td>Diane Fazzi</td>
<td>Associate Dean, Charter College of Education</td>
</tr>
<tr>
<td>Catherine Haras</td>
<td>Director, Center for Effective Teaching and Learning</td>
</tr>
<tr>
<td>Tanya Ho</td>
<td>University Internal Auditor</td>
</tr>
<tr>
<td>Thomas Johnson</td>
<td>Director, Procurement and Contracts</td>
</tr>
<tr>
<td>Philip LaPolt</td>
<td>Associate Vice President, Academic Affairs</td>
</tr>
<tr>
<td>Alice Kawakami</td>
<td>University Librarian</td>
</tr>
<tr>
<td>Susana Moreno</td>
<td>Staff, University Advancement</td>
</tr>
<tr>
<td>Mariel Mulet</td>
<td>Director, Office of Diversity, Equity, and Inclusion</td>
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<tr>
<td>Sheryl Okuno</td>
<td>Director, Information Technology Security and Compliance</td>
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<tr>
<td>Andrew Pesich</td>
<td>Information Technology Consultant</td>
</tr>
<tr>
<td>Peter Quan</td>
<td>Vice President of Information Technology Services and Chief Technology Officer</td>
</tr>
<tr>
<td>Salvador Rodriquez</td>
<td>Senior Internal Auditor</td>
</tr>
<tr>
<td>Anthony Ross</td>
<td>Vice President, Student Affairs</td>
</tr>
<tr>
<td>Rowena Tran</td>
<td>Interim Executive Director, University Student Union</td>
</tr>
<tr>
<td>Susan Varela</td>
<td>Associate VP, Human Resources Management</td>
</tr>
<tr>
<td>David Wong</td>
<td>Information Technology Consultant, Charter College of Education</td>
</tr>
<tr>
<td>Russell Young</td>
<td>Information Technology Consultant, Charter College of Education</td>
</tr>
<tr>
<td>Holly Yu</td>
<td>Library Web Administrator</td>
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</tbody>
</table>
October 24, 2014

Mr. Larry Mandel, Vice Chancellor and Chief Audit Officer  
Office of Audit and Advisory Services  
Office of the Chancellor – The California State University  
401 Golden Shore, 4th Floor  
Long Beach, CA 90802-4210

Re: Implementation of Recommendations Contained in Report Number 14-33, Accessible Technology

Dear Vice Chancellor Mandel:

Attached is the University’s response to the recommendations contained in Report Number 14-33, Accessible Technology audit.

Please contact Tanya Ho, University Internal Auditor, at (323) 343-5102, if you wish to discuss the matter contained herein.

Sincerely,

William A. Covino  
President

Attachment

cc: (with attachments)  
Lisa Chavez, Vice President for Administration and Chief Financial Officer  
Tanya Ho, University Internal Auditor  
Jill Carnahan, Administrative Compliance Officer
GOVERNANCE

ACCESSIBLE TECHNOLOGY PLAN

Recommendation 1

We recommend that the campus update the ATI plan to provide clear and measurable steps for achieving goals listed in the current annual cycle and to describe how priorities will be determined.

Campus Response

The campus will update the ATI plan to provide clear and measurable steps for achieving goals listed in the current annual cycle and describe how priorities will be determined by December 31, 2014.

ACCESSIBLE TECHNOLOGY REPORTING

Recommendation 2

We recommend that the campus amend future ATI annual reports to ensure that the success indicators coincide with those in the campus ATI plan.

Campus Response

For future ATI annual reports, the campus will ensure that success indicators coincide with the campus ATI plan. This will be reflected in the next annual report to be submitted by November 14, 2014.

ACCESSIBLE TECHNOLOGY WEBSITE

Recommendation 3

We recommend that the campus update the ATI website with current information related to the ATI project plan, timeline, committee members, and procurement procedures.

Campus Response

The ATI website will be converted to the new content management system by December 31, 2014, that will include a posting of the ATI project plan, the timeline, committee members, and procurement procedures.
WEB ACCESSIBILITY

Recommendation 4

We recommend that the campus and auxiliaries develop and implement a process to manually perform accessibility reviews of documents added to websites.

Campus Response

The campus will develop, document and implement a process to manually perform accessibility reviews of documents added to websites by December 31, 2014.

PROCUREMENT

Recommendation 5

We recommend that:

a. The Foundation and USU revise their procurement policies and procedures to specifically address ATI requirements.

b. The campus require an ATI assessment for all E&IT purchases.

Campus Response

a. The Foundation and USU procurement policies and procedures will be revised to reference to the campus procedures which address ATI requirements. Date of implementation will be December 31, 2014.

b. The campus will develop an ATI assessment for E&IT purchases by December 31, 2014.
November 5, 2014

MEMORANDUM

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

FROM: Timothy P. White  
Chancellor

SUBJECT: Draft Final Report 14-33 on Accessible Technology,  
California State University, Los Angeles

In response to your memorandum of November 5, 2014, I accept the response as submitted with the draft final report on Accessible Technology, California State University, Los Angeles.

TPW/amd