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To: Presidents
                 Provosts/Vice Presidents of Academic Affairs

From: Ephraim P. Smith
                 Executive Vice Chancellor and Chief Academic Officer

Subject: **Accessible Technology Initiative**

Background

The Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973 (504) require that qualified individuals be provided equal access to programs, services, and activities. California Government Code 11135 applies Section 508 of the 1973 Rehabilitation Act, as amended in 1998, to State entities and to the California State University (CSU). Section 508 of the Rehabilitation Act was enacted to eliminate barriers in information technology, to make available new opportunities for people with disabilities and to encourage development of technologies that will help achieve these goals.

The CSU policy statement on accessibility is articulated in Executive Order 926. Implementation of this policy is guided by the Accessible Technology Initiative (ATI) as established in Coded Memo AA-2006-41 and revised in the following coded memos: AA-2007-04, AA-2007-13, AA-2008-21, AA-2009-19, AA-2010-13, and AA-2011-21. This coded memo supersedes all previous coded memos.

Vision

All CSU programs, services, and activities should be accessible to all students, staff, faculty, and the general public. This encompasses all technology products used to deliver academic programs and services, student services, information technology services, and auxiliary programs and services.

The CSU's Accessible Technology Initiative (ATI) implementation approach is driven by the following principles:

- Technology accessibility is an institution-wide responsibility that requires commitment and involvement from leadership across the enterprise.

CSU Campuses

Bakersfield	Fresno	Monterey Bay	San Francisco
Channel Islands	Fullerton	Northridge	San José
Chico	Humboldt	Pomona	San Luis Obispo
Dominguez Hills	Long Beach	Sacramento	San Marcos
East Bay	Los Angeles	San Bernardino	Sonoma
	Maritime Academy	San Diego	Stanislaus

- Technology access for individuals with disabilities must provide comparable functionality, affordability, and timeliness and should be delivered in as seamless a manner as possible.
- The implementation of Universal Design principles should reduce the need for, and costs associated with, individual accommodations for inaccessible technology products.

Key Strategies

The CSU Accessible Technology Initiative targets the elimination of accessibility barriers across the university. The CSU is using a "capabilities maturity" strategy to achieve its vision for accessibility. This strategy focuses campus and system efforts on continuously improving and institutionalizing its business and academic processes that will reliably, sustainably, and successfully deliver accessible educational, administrative, and community services for all. The implementation of the ATI is based on the following key components:

- **Establish strong administrative/executive support**. The CSU codified its commitment to technology accessibility in Executive Order 926. Pursuant to EO 926, campus presidents are charged with establishing a campus committee and overseeing campus ATI activities.
- **Ensure continuous quality improvement**. Some ATI goals require investments and changes to business procedures that will require time to deploy to our large, diverse CSU community. Just as accessibility barriers often develop over a period of years, remediation activities will sometimes require years to fully implement. During this extended remediation period, the CSU should work to achieve incremental improvements in barrier removal each year.
- **Prioritize projects/activities**. The ATI covers a broad range of technology accessibility goals involving technology products in use across all university programs and services. Given that there are finite resources (e.g. staffing, time, and tools) available each year to work on these goals, campuses should select ATI implementation activities that target accessibility barriers with the greatest impact.
- **Identify specific Goals/Success Indicators**. In order to ensure that meaningful progress is made over time, the CSU has collectively established specific ATI goals and success indicators. The broad ATI goals are articulated in the 'Goals' subsection below. The Success Indicators are published and available on the ATI website.
- **Document progress**. It is critical that the CSU document the substantive steps that have been taken over time to remove technology accessibility barriers. This approach (1) establishes a credible institutional commitment to equal access for persons with disabilities and facilitates reporting during campus audits. The CSU ATI implementation therefore utilizes annual campus reports to document progress (discussed further in the 'Annual Reports' subsection below).
- **Drive vendor improvements to product accessibility support**. The CSU seeks to improve product accessibility through partnerships and by leveraging the procurement process.

Implementation Goals
Campuses are required to accomplish the ATI goals listed below. Each ATI goal is supported by a set of success indicators that describe the processes, procedures, and activities that need to be accomplished in order to meet the goal. As changes in technology occur, the success indicators may be modified following consultation with campus executive leadership.

Web Accessibility Goals
- **Web Accessibility Evaluation Process:** Identify and repair or replace inaccessible websites, web applications, and digital content.
- **New Website/Web Application and Digital Content Design and Development Process:** New website/web application and digital content development complies with all Section 508 accessibility guidelines.
- **Ongoing Monitoring Process:** Updating and maintenance of websites/web applications and digital content comply with Section 508 Accessibility Standards.
- **Exemptions and Alternatives Process**: Documented non-compliant websites, web applications and digital content must be delivered in an equally effective alternate format and granted an exemption.
- **Training Process:** Professional development training has incorporated Section 508 accessibility guidelines into website and web applications development and digital content preparation.
- **Communication Process:** The campus community is aware of Section 508 guidelines to make web based information available to everyone (students, staff, faculty & the general public) regardless of disability.
- **Administrative Process:** Campus governance entities are aware of and kept informed about web accessibility.

Procurement Accessibility Goals
- **Procurement Procedures:** An ATI Electronic and Information Technology (E&IT) Procurement Plan, documents, forms, and other materials to support 508 procurements at the campus are created and published.
- **Staffing or Role Definition**: ATI procurement team is fully staffed with clearly defined roles for processing E&IT procurements.
- **Exemption Process**: A well-documented process has been established and is used for exemptions to E&IT procurements.
- **Equally Effective Access Plans**: Equally Effective Access Plans are created for E&IT products that are not fully 508 compliant.
- **Training**: All parties involved in E&IT procurement have been trained, and a continual training program is in place.
- **Outreach (Communications)**: All individuals on campus involved in the purchasing of goods are knowledgeable about Section 508 in the context of E&IT procurement.
- **Evaluation & Monitoring**: Campus has established a continual evaluation process with standard forms and procedures. Feedback from the process along with direction is provided to training, outreach, and other groups involved in E&IT procurements.

- **Experience/Implementation**: Campuses have sufficient experience and expertise in completing E&IT procurements.

Instructional Materials Accessibility Goals
- **Timely Adoption:** The campus has implemented a comprehensive plan to ensure the timely adoption of textbooks and other instructional materials.
- **Identification of Instructional Materials for Late-Hire Faculty**: The campus has implemented a comprehensive plan to ensure that textbooks have been identified for courses with late-hire faculty.
- **Early Identification of Students with Disabilities**: The campus has implemented a comprehensive plan to ensure that students with disabilities are identified and able to request alternate media materials in a timely manner.
- **Faculty Use of Learning Management Systems (or non-Learning Management System) Course Websites**: The campus has implemented policies and procedures to promote the posting of all required curricular and instructional resources (including print-based and multimedia materials) in a central, accessible electronic location.
- **Accessibility Requirements for Multimedia**: The campus has implemented policies and procedures to ensure that accessibility requirements have been incorporated into the adoption process for all multimedia-based instructional resources.
- **Accessibility Requirements for Curricular Review and Approval**: The campus has implemented policies and procedures to ensure that accessibility requirements have been incorporated into the curricular review process.
- **Supporting Faculty Creation of Accessible Instructional Materials**: The campus has implemented policies and procedures to support faculty in selecting, authoring, and delivering accessible instructional materials.
- **Communication Process and Training Plan**: The campus has implemented a broad-based ATI awareness campaign, supported by a comprehensive training infrastructure to increase technological accessibility across the campus.
- **Process Indicators**: Campus Instructional Materials Accessibility Plan (IMAP) committee has sufficient breadth, resources, and authority to effectively implement a comprehensive IMAP initiative.

Implementation Approach
The ATI recognizes that each CSU campus faces unique challenges with implementing the ATI. The implementation approach outlined below was therefore developed in collaboration with the Executive Sponsors Steering Committee (ESSC), the ATI Leadership Council and the ATI Priority Area Communities of Practice to ensure that campuses have adequate flexibility to manage their ATI implementation.

Each year, the CSU will make progress toward accomplishing the ATI goals by using a combination of systemwide and campus-based activities. Campuses will assess their capacity, select specific success indicators to work on, engage in a variety of projects and activities that address these success indicators, and report on their progress in the ATI Annual Reports. In

addition, the ATI, in consultation with campus leaders, will select success indicators to work on collaboratively at the systemwide level.

Chancellor's Office ATI Responsibilities

The ATI department is part of systemwide Academic Technology Services (ATS) within the Academic Affairs division. ATS will continue supporting the ATI by providing staffing and resources. The ATI is committed to helping campuses accomplish the ATI goals by engaging in the following activities:

- Supporting campus ATI planning and implementation efforts by: developing guidance, providing training resources, sharing significant accomplishments and exemplary practices, and researching promising tools and techniques.
- Coordinating systemwide ATI activities that reduce costs, leverage CSU resources, and increase capacity.
- Collaborating with campus leadership through the ATI Leadership Council and Executive Sponsors Steering Committee to implement systemwide accessible technology policy, projects, and planning.
- Maintaining effective ongoing communication with key stakeholder groups and consulting with systemwide affinity groups.
- Coordinating the annual report process including analyzing ATI Annual Reports and distributing systemwide aggregated report results.
- Providing systemwide support to drive improvements to product accessibility support by vendors and publishers.

Campus ATI Responsibilities

The ATI Steering Committee on each campus and at the Chancellor's Office will oversee the ATI implementation including reviewing and revising the ATI Campus Plan, implementing project and activities to meet ATI goals, and documenting progress toward these goals using the ATI Annual Report process. Each of these responsibilities is described in more detail below.

Participation by Key Stakeholder Groups on Campus

- **Campus Administration including Presidents, Provosts, CIO's, Vice-Presidents**: Provide regular communication and ensure adequate resources in support of the ATI campus implementation.
- **Academic and Faculty Senates**: The Senate Chair or their designee is strongly encouraged to serve on the campus ATI Steering Committee and participate in ATI instructional materials activities. The Senate at large is strongly encouraged to pass and facilitate the implementation of policies or resolutions that support the adoption of accessible technology.
- **Centers for Faculty Development:** Participate in relevant campus ATI committees and systemwide activities; Coordinate or actively participate in providing faculty training on ATI-related subjects.
- **Disability Services Offices:** Participate in the campus ATI Steering Committee; Participate in the development of Equally Effective Alternate Access Plans.

- **ADA Compliance Office:** Participate in the campus ATI Steering Committee; actively support the campus ATI implementation.

Reviewing/Revising the ATI Campus Plan

Each year, the campus Executive Sponsor, working with the campus ATI Steering Committee, will review and update the ATI Campus Plan to guide their implementation. The Plan will indicate the specific success indicators on which the campus will focus its efforts across the 3 priority areas. Campuses may adopt the ATI Campus Plan Template provided by the ATI or develop their own plan format. The Campus Plan Template is available on the ATI website.

When developing the Plan, campuses should consider the following information:

- Current campus progress as described in the Annual Report with particular attention to success indicators with a status level of Not Started or Initiated.
- Select ATI implementation activities across all 3 priority areas that will result in the greatest reduction of technology accessibility barriers.
- Use the ATI Prioritization Framework or a comparable campus process to consider factors such as impact, probability, and campus capacity when prioritizing ATI implementation activities.
- Deliverables associated with systemwide ATI activities that would advance campus progress if adopted.
- Campus collaborations that may accelerate or improve the quality of ATI activities.

Implementing the ATI Campus Plan

Ensuring the accessibility of information technology and resources is a shared responsibility of the entire campus and requires a coordinated, ongoing effort to ensure its success. Campus executive sponsors should lead the implementation effort on their campus through the following activities:

- Conduct regular ATI Steering Committee meetings no less than twice per year.
- Ensure that the Committee membership is comprised of all key stakeholder groups and includes members with appropriate experience and expertise to inform decision-making.
- Engage in a periodic administrative review process with the Committee regarding challenges, milestones, resources, and documenting ongoing progress.
- Monitor, leverage, and implement deliverables from systemwide ATI activities that will advance campus efforts.
- Ensure that Committee members monitor, participate in, and contribute to Community of Practice activities.
- Channel communications from the Chancellor's Office to appropriate parties on campus

Documenting Progress Using the Annual ATI Report

Campuses will submit an ATI Annual Report to the Chancellor's Office each year which details campus progress towards accomplishing the ATI Goals. The Chancellor's Office ATI department will provide the framework and methodology for submitting ATI annual reports to campuses.

When completing the Annual Report each year, campuses will:

- Affirm that the campus has reviewed and revised its ATI Campus Plan.
- Report on the status of all goals and success indicators since campus progress may result from systemwide and campus–level activities.
- Document the campus commitment to work on specific success indicators.

Implementation Timeline
The timeline associated with ATI implementation tasks is provided below.

- **July-October**: Review/revise the ATI Campus Plan.
- **November**: Submit the ATI Campus Annual Report and affirm that the ATI Campus Plan has been reviewed and revised.
- **April**: Review the systemwide aggregate reports that describe progress across the system.

The Chancellor's Office ATI department will support the implementation timeline through the following activities:

- **July**: Distribute the Campus Annual Report.
- **December-March**: Review the Campus Annual Report submissions and prepare systemwide aggregate reports.
- **April**: Distribute the systemwide aggregate reports that describe progress across the system.