AMERICANS WITH DISABILITIES ACT COMPLIANCE

CALIFORNIA STATE UNIVERSITY,
LONG BEACH

Audit Report 11-46
September 22, 2011

Members, Committee on Audit

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ABBREVIATIONS

ADA  Americans with Disabilities Act
ATI  Accessible Technology Initiative
CSU  California State University
CSULB California State University, Long Beach
DSS  Disabled Student Services
EO   Executive Order
NIMS National Incident Management System
SEMS State Emergency Management System
EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2010, the Board of Trustees, at its January 2011 meeting, directed that Americans with Disabilities Act (ADA) Compliance be reviewed. The Office of the University Auditor had previously reviewed ADA activities as part of the 2002 audits of Disability Support and Accommodations at ten campuses.

We visited the California State University, Long Beach campus from July 5, 2011, through July 29, 2011, and audited the procedures in effect at that time.

Our study and evaluation revealed certain conditions that, in our opinion, could result in significant errors and irregularities if not corrected. Specifically, the campus did not maintain adequate internal control over the following areas: the Disabled Student Services Advisory Committee, nondiscrimination training, and program and physical accessibility. These conditions, along with other weaknesses, are described in the executive summary and body of this report. In our opinion, except for the effect of the weaknesses described above, the operational and administrative controls for ADA activities in effect as of July 29, 2011, taken as a whole, were sufficient to meet the objectives stated in the “Purpose” section of this report.

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.

GENERAL ENVIRONMENT [8]

Administration of the Disabled Student Services Advisory Committee needed improvement. For example, the committee had not met on a regular basis, and the list of sitting committee members was outdated and did not include representatives from business and finance, information technology, and procurement. Further, committee members did not have appointment letters from the president or designee, and the committee had not defined reporting requirements in a charter or other similar document.

NONDISCRIMINATION TRAINING [9]

The campus did not always document nondiscrimination refresher training for faculty and staff, nor had it developed a related training policy.
PROGRAM AND PHYSICAL ACCESSIBILITY [10]

Emergency evacuation procedures for individuals with disabilities needed improvement. Specifically, the campus emergency operations plan on the campus website did not address evacuation procedures for individuals with disabilities, and building marshals and other campus emergency team personnel did not always receive annual specialized training addressing evacuation, shelter-in-place, refuge areas, and use of evacuation chairs for individuals with disabilities.
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 March 1980, CSU developed a policy statement, the Policy for the Provision of Services to Students with Disabilities, that formalized the objectives of the Disabled Students Program: to increase the enrollment of students with disabilities in the total student population, and to facilitate their access to all educational programs. It also detailed program goals and objectives, definitions of disabilities, and support services to be offered. In 1980, the CSU Systemwide Advisory Committee on Services to Students with Disabilities was established. The Policy for the Provision of Services to Students with Disabilities was revised in 1989, in part to incorporate disability services identified in 1987’s Assembly Bill 746, State Funded Disabled Student Programs and Services.

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 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 2010 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 ATI will continue to evolve as new needs are identified.

In September 2008, the ADA Amendments Act of 2008 was signed into law, and it became effective on January 1, 2009. The amendments clarified and reiterated who is covered by the law’s civil rights protections and revises the definition of “disability” to more broadly encompass impairments that substantially limit a major life activity. The amended language also states that mitigating measures, including assistive devices, auxiliary aids, accommodations, medical therapies, and supplies have no bearing in determining whether a disability qualifies under the law.
Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to ADA compliance 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 ADA compliance incorporates a defined mission, stated goals and objectives, and clear lines of organizational authority and responsibility, as well as formation of an Advisory Committee on Services to Students with Disabilities, a standing committee on Disability Access and Compliance, and an ATI Steering Committee.

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

- The adequacy of and satisfaction with the ADA 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.

- People and campus areas providing disabled student services possess the necessary qualifications and are appropriately trained and aware of their roles and responsibilities.

- 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.

- Verification of disabilities is timely and adequately performed, and appropriate documentation is provided in compliance with CSU and campus policies.

- Disability information and records are properly maintained, safeguarded, and retained in accordance with state and federal regulations and CSU policy.

- Campus 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.

- Campus disaster and evacuation plans include evacuation procedures for people with disabilities.

- Budgeting procedures adequately address program funding and ensure effective accounting and management control, and grant funds are administered in compliance with sponsor agreements.

- Chargebacks for disability support services are complete and accurate, valued properly, and processed in a timely manner, and credit is received.
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 ATI is adequate.
SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Attachment A, Audit Agenda Item 2 of the January 25 and 26, 2011, meeting of the Committee on Audit stated that ADA compliance includes compliance with federal, state, and local rules and regulations that relate to the ADA of 1990 (Title 42). Of primary concern is appropriateness of systemwide guidance, management culture, facility specifications and accommodations, 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; review of facility initial or modification design process; 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 that accounting and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor policies, letters, and directives. The audit focused on procedures in effect from July 1, 2008, through May 13, 2011.

A preliminary risk assessment of campus ADA compliance information was used to select for our audit testing those areas or activities with highest risk. This assessment was based upon a systematic process using management’s feedback and professional judgments on probable adverse conditions and other pertinent information, including prior audit history in this area. We sought to assign higher review priorities to activities with higher risks. As a result, not all risks identified were included within the scope of our review.

Based upon this assessment of risks, we specifically included within the scope of our review the following:

- Monitoring of the quality and effectiveness of campus ADA program services.
- Resolution of complaints and grievances relating to program and physical accessibility.
- Qualifications of services to students with disabilities staff and campuswide training practices.
- Provision of reasonable access and accommodations to applicants and employees.
- Verification of disabilities and providing (or declining) of services to students with disabilities.
- Maintenance and protection of disability information from unauthorized disclosure.
- Provision of programs, services, and activities that are readily accessible to disabled individuals.
- Administration of program and grant funds for ADA compliance.
- Processing and collection of chargebacks for ADA-related services provided to self-supporting operations.
- Recording, safeguarding, and maintenance of inventory for auxiliary aids and equipment.
- 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

GENERAL ENVIRONMENT

Administration of the Disabled Student Services (DSS) Advisory Committee needed improvement.

We noted that:

- The committee had not met on a regular basis.
- The list of sitting committee members was outdated and did not include representatives from business and finance, information technology, and procurement.
- Committee members did not have appointment letters from the president or designee.
- The committee had not defined reporting requirements in a charter or other similar document.

Coded Memorandum Academic Affairs 2009-27, Policy for the Provision of Accommodations and Support to Students with Disabilities, dated December 17, 2009, states that members of the campus Advisory Committee shall be appointed by the campus president or designee.

California State University, Long Beach (CSULB) Advisory Committee Mission states that the DSS Advisory Committee is charged with the responsibility of providing leadership, guidance, and assessment of issues facing individuals with disabilities who are part of the CSULB family (students, staff, faculty, and guests).

Executive Order (EO) 926, The California State University Board of Trustees Policy on Disability Support and Accommodations, dated December 20, 2004, 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 the Associated Students, Inc., one faculty member appointed by the academic senate, and one staff representative, to discuss, monitor, and evaluate campus-specific issues relating to compliance with this executive order and applicable federal and state laws and regulations.

The director of DSS stated that the committee had not met more frequently because other advisory committees were addressing many of the issues typically addressed by the committee. He also stated that committee members did not have appointment letters due to the longevity of their terms, which pre-dated the requirement mandated in the policy. Further, he stated that as a result of members separating from the committee, he had forgotten to update the member list and appoint new members with similar specialization. Finally, he stated that the committee’s reporting requirements had not been defined because the committee’s charge had been explained in meetings.

Failure to maintain effective administration of the DSS Advisory Committee increases the risk that campus programs, services, and activities will not be fully accessible to all individuals.
Recommendation 1

We recommend that the campus:

a. Conduct DSS Advisory Committee meetings on a regular basis.

b. Update the list of sitting committee members and include representatives from business and finance, information technology, and procurement.

c. Obtain appointment letters from the president or designee for committee members.

d. Define the committee’s reporting requirements in a charter or other similar document.

Campus Response

We concur.

a. DSS has established regular meetings four times a year, for the DSS Advisory Committee. As a matter of fact, DSS already had its first meeting of the year held on October 11, 2011. Subsequently, meetings will be held in December, February, and May. Corrective action on this issue is complete.

b. DSS updated the sitting committee membership and has added representation from business and finance, budget management, information technology, academic technology services, and procurement – purchasing office. Corrective action on this issue is complete.

c. DSS is working with the office of the vice president for student services on composing an appointment letter for all committee members. Estimated date of completion is November 1, 2011.

d. DSS adapted the following charter language for the committee’s reporting requirements: “The Disabled Student Services Advisory Committee reports to the vice president for student services and is charged with the responsibility of providing leadership, guidance, and assessment of issues facing individuals with disabilities who are part of the CSULB family (students, staff, faculty, and guests). This committee will review major policies, procedures, and decisions while having a direct impact on individuals with disabilities here at CSULB. Our goal is to ensure access and that CSULB will offer reasonable and appropriate auxiliary aides and services to otherwise qualified persons in programs, services, and facilities in accordance with Section 504 Rehab Act 1973, Section 508, Title III of the ADA and CSU’s policy on service provision to students with disabilities.” Estimated date of completion is December 15, 2011.

NONDISCRIMINATION TRAINING

The campus did not always document nondiscrimination refresher training for faculty and staff, nor had it developed a related training policy.
EO 883, *Systemwide Guidelines for Nondiscrimination and Affirmative Action Programs in Employment*, dated October 31, 2003, states that training should cover, but is not limited to, the types of discrimination (including sexual harassment and racial, ethnic, national origin, sex, and disability discrimination), the methods of reporting discrimination, and the respective responsibilities of management and staff in reporting, investigating, and resolving discrimination complaints. It is recommended that training be provided to all new employees shortly after their start dates and periodically thereafter. It is further recommended that information contained in the training be made accessible for reference by current employees annually.

The manager of ADA compliance stated that disability discrimination refresher training was not attended by all non-faculty employees due to the administrative difficulty in enforcing participation and because the development of a training policy was not a priority. The director of the faculty center for professional development stated that disability discrimination refresher training was not required of all tenure track faculty due to the difficulties in enforcing completion.

Failure to document nondiscrimination refresher training for faculty and staff and to maintain campus policy for ADA nondiscrimination training increases the risk that employees will not be fully aware of nondiscrimination procedures and requirements, thereby increasing the risk of litigation.

**Recommendation 2**

We recommend that the campus:

a. Document nondiscrimination refresher training for faculty and staff.

b. Develop and implement policies for nondiscrimination refresher training.

**Campus Response**

We concur. The office of equity and diversity, in cooperation with human resources management and faculty affairs, will develop and implement a policy for a formal refresher training program, including documenting that the training has taken place. We plan to include this refresher training in existing formalized faculty and staff training sessions. Estimated date of completion is January 31, 2012.

**PROGRAM AND PHYSICAL ACCESSIBILITY**

Emergency evacuation procedures for individuals with disabilities needed improvement.

We noted that:

- The campus emergency operations plan on the campus website did not address evacuation procedures for individuals with disabilities.

- Building marshals and other campus emergency team personnel did not always receive annual specialized training addressing evacuation, shelter-in-place, refuge areas, and use of evacuation chairs for individuals with disabilities.
The California Emergency Management Agency states that evacuation planning should ensure that both functional needs and access for individuals with disabilities are addressed, and that an evacuation plan that does not address functional needs is incomplete.

EO 1056, *California State University Emergency Management Program*, dated March 7, 2011, states that campuses should train the campus community on the California State Emergency Management System (SEMS) and National Incident Management System (NIMS) compliant campus plan. At a minimum, specialized training should be performed annually for employees designated either as building coordinator or building floor marshal, Emergency Operations Center team member, or member of the campus emergency management team. Specialized training includes, but is not limited to, SEMS, NIMS and crisis response.

The sergeant of university police stated his belief that evacuation procedures for individuals with disabilities were on the emergency website. He also stated that specialized training was not always attended because the employees in the campus building marshal program were volunteers, and therefore training was also attended on a voluntary basis.

Failure to address evacuation procedures for individuals with disabilities and provide specialized training for emergency team personnel increases the risk that emergency responders will not be fully aware of their responsibilities related to the evacuation of individuals with disabilities, consequently increasing the risk of inadequate response to emergencies.

**Recommendation 3**

We recommend that the campus:

a. Update the emergency operations plan on the campus website to address evacuation procedures for individuals with disabilities.

b. Provide annual specialized training addressing evacuations, shelter-in-place, refuge areas, and use of evacuation chairs for individuals with disabilities to building marshals and other campus emergency team personnel.

**Campus Response**

We concur.

a. The campus has updated its website for emergency preparedness to include additional information on the evacuation of individuals with disabilities. The procedures outlined dealt with mobility challenged, vision impaired, deafness, etc. Corrective action on this issue is complete.

b. Additional training in dealing with persons with disabilities was added to the curriculum in the building marshal training program. While we discuss these concerns in more depth during training, we also provided the building marshals handouts that outline specific circumstances. Corrective action on this issue is complete.
## APPENDIX A:
### PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td>F. King Alexander</td>
<td>President</td>
</tr>
<tr>
<td>Terre Allen</td>
<td>Director, Faculty Center for Professional Development</td>
</tr>
<tr>
<td>Scott Apel</td>
<td>Associate Vice President, Human Resources Management</td>
</tr>
<tr>
<td>Susan Brown</td>
<td>Director, Physical Planning and Construction Management</td>
</tr>
<tr>
<td>Eric Bullard</td>
<td>Associate Dean, College of Continuing and Professional Education</td>
</tr>
<tr>
<td>Laurinda Fuller</td>
<td>Director, Purchasing and Financial Services</td>
</tr>
<tr>
<td>Forouzan Golshani</td>
<td>Dean, College of Engineering</td>
</tr>
<tr>
<td>Richard Goodwin</td>
<td>Sergeant, University Police</td>
</tr>
<tr>
<td>Vickie Hamilton</td>
<td>Associate Director, Staff Human Resources</td>
</tr>
<tr>
<td>Holly Harbinger</td>
<td>Associate Vice President, Faculty Affairs</td>
</tr>
<tr>
<td>Jo Ann Harris</td>
<td>Administrative Support Coordinator, Office of Equity and Diversity</td>
</tr>
<tr>
<td>Byron Jackson</td>
<td>Director of Services Management and Operations, Information Technology Services</td>
</tr>
<tr>
<td>Ted Kadowaki</td>
<td>Associate Vice President, Budget and University Services</td>
</tr>
<tr>
<td>Mike Kelly</td>
<td>Associate Director, Design and Minor Capital Projects</td>
</tr>
<tr>
<td>Leslie Kennedy</td>
<td>Director of Instructional Technology Support Services, Academic Technology Services</td>
</tr>
<tr>
<td>Karen Kerr</td>
<td>Assistant Director of Employment, Staff Human Resources</td>
</tr>
<tr>
<td>Ed Lara</td>
<td>Web Development Center Lead, Information Technology Services</td>
</tr>
<tr>
<td>Peter Perbix</td>
<td>Coordinator for Support Services and Advising, Disabled Student Services</td>
</tr>
<tr>
<td>Art Perez</td>
<td>Associate Director, Housing and Residential Life</td>
</tr>
<tr>
<td>Janice Reyes</td>
<td>Manager, Americans with Disabilities Act Compliance, Office of Equity and Diversity</td>
</tr>
<tr>
<td>Carol Roberts-Corb</td>
<td>Director, Housing and Residential Life</td>
</tr>
<tr>
<td>Doug Robinson</td>
<td>Vice President, Student Services</td>
</tr>
<tr>
<td>David Salazar</td>
<td>Associate Vice President, Physical Planning and Facilities Management</td>
</tr>
<tr>
<td>David Sanfilippo</td>
<td>Director, Disabled Student Services</td>
</tr>
<tr>
<td>Aysu Spruill</td>
<td>Director, Internal Audit and Information Security</td>
</tr>
<tr>
<td>Mary Stephens</td>
<td>Vice President, Administration and Finance</td>
</tr>
<tr>
<td>Mary Ann Takemoto</td>
<td>Associate Vice President, Student Services</td>
</tr>
</tbody>
</table>
October 27, 2011

Mr. Larry Mandel
University Auditor
California State University
401 Golden Shore
Long Beach, California 90802

Re: Response to Americans with Disabilities Act Compliance Audit #11-46

Dear Larry:

Please find enclosed California State University, Long Beach's response to the above report. The campus is committed to addressing and resolving the issues identified in the audit report.

Please let me know if we can provide you with any additional information.

Sincerely,

Mary Stephens
Vice President for Administration and Finance

Enclosure

IA-0280

c:  F. King Alexander, President
    Scott Apel, Associate Vice President, Human Resources Management
    Larisa Hamada, Director, Equity and Diversity
    Holly Harbinger, Associate Vice President, Faculty Affairs
    Ted Kadowaki, Associate Vice President, Budget and University Services
    Douglas W. Robinson, Vice President for Student Services
    David Sanfilippo, Director, Disabled Student Services
    Fernando Solorzano, Chief of Police
    Aysu Spruill, Director, Internal Auditing Services/Information Security Officer
GENERAL ENVIRONMENT

Recommendation 1

We recommend that the campus:

a. Conduct DSS Advisory Committee meetings on a regular basis.

b. Update the list of sitting committee members and include representatives from business and finance, information technology, and procurement.

c. Obtain appointment letters from the president or designee for committee members.

d. Define the committee’s reporting requirements in a charter or other similar document.

Campus Response

We concur.

a. DSS has established regular meetings four times a year, for the DSS Advisory Committee. As a matter of fact, DSS already had its first meeting of the year held on October 11, 2011. Subsequently, meetings will be held in December, February, and May. Corrective action on this issue is complete.

b. DSS updated the sitting committee membership and has added representation from Business and Finance, Budget Management, Information Technology, Academic Technology Services, and Procurement – Purchasing Office. Corrective action on this issue is complete.

c. DSS is working with the Office of the Vice President for Student Services on composing an appointment letter for all committee members. Estimated date of completion is November 1, 2011.

d. DSS adapted the following charter language for the committee’s reporting requirements: “The Disabled Student Services Advisory Committee reports to the Vice President for Student Services and is charged with the responsibility of providing leadership, guidance, and assessment of issues facing individuals with disabilities who are part of the CSULB family (students, staff, faculty, and guests). This committee will review major policies, procedures, and decisions while having a direct impact on individuals with disabilities here at CSULB. Our goal is to ensure access and that CSULB will offer reasonable and appropriate auxiliary aides and services to otherwise qualified persons in programs, services, and facilities in accordance with Section 504 Rehab Act
1973, Section 508, Title III of the ADA and CSU’s policy on service provision to students with disabilities.” Estimated date of completion is December 15, 2011.

NONTDISCRIMINATION TRAINING

Recommendation 2

We recommend that the campus:

a. Document nondiscrimination refresher training for faculty and staff.
b. Develop and implement policies for nondiscrimination refresher training.

Campus Response

We concur. The Office of Equity and Diversity in cooperation with Human Resources Management and Faculty Affairs will develop and implement a policy for a formal refresher training program, including documenting that the training has taken place. We plan to include this refresher training in existing formalized faculty and staff training sessions. Estimated date of completion is January 31, 2012.

PROGRAM AND PHYSICAL ACCESSIBILITY

Recommendation 3

We recommend that the campus:

a. Update the emergency operations plan on the campus website to address evacuation procedures for individuals with disabilities.
b. Provide annual specialized training addressing evacuations, shelter-in-place, refuge areas, and use of evacuation chairs for individuals with disabilities to building marshals and other campus emergency team personnel.

Campus Response

We concur.

a. The campus has updated its website for “Emergency Preparedness” to include additional information on the evacuation of individuals with disabilities. The procedures outlined dealt with mobility challenged, vision impaired deafness, etc. Corrective action on this issue is complete.
b. Additional training in dealing with persons with disabilities was added to the curriculum in the Building Marshal training program. While we discuss these concerns in more depth during training, we also provided the building marshals handouts that outline specific circumstances. Corrective action on this issue is complete.
November 14, 2011

MEMORANDUM

TO: Mr. Larry Mandel
   University Auditor

FROM: Charles B. Reed
      Chancellor

SUBJECT: Draft Final Report 11-46 on
         Americans with Disabilities Act Compliance
         California State University, Long Beach

In response to your memorandum of November 14, 2011, I accept the response as submitted with the draft final report on Americans with Disabilities Act Compliance, California State University, Long Beach.

CBR/amd