AMERICANS WITH DISABILITIES ACT COMPLIANCE

SAN DIEGO STATE UNIVERSITY

Audit Report 11-47
September 16, 2011

Members, Committee on Audit

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ABBREVIATIONS

AA  Academic Affairs
ADA  Americans With Disabilities Act
ATI  Accessible Technology Initiative
CIO  Chief Information Officer
CSU  California State University
DACC Disability Access and Compliance Committee
EO  Executive Order
SDSU San Diego State University
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 San Diego State University campus from July 5, 2011, through August 5, 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: disability access and compliance committee, program and physical accessibility, employee qualifications and training, and accessible technology. 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 August 5, 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]

The campus Disability Access and Compliance Committee was inactive. Also, the campus did not have a written complaint procedure for handling allegations of discrimination, harassment, and retaliation from applicants and independent contractors.

PROGRAM AND PHYSICAL ACCESSIBILITY [9]

The campus Americans with Disabilities Act transition plan was not updated to reflect changes in priorities, expected remediation, or improvements and/or barrier removals that were made since the plan update in 2008.

EMPLOYEE QUALIFICATIONS AND TRAINING [10]

The campus did not always document nondiscrimination training for newly hired employees, nor had it developed a related refresher training policy.
ACCESSIBLE TECHNOLOGY [11]

The campus had not developed and communicated enforcement and sanction procedures for web pages determined to be noncompliant with accessibility standards, nor had it developed a policy that defined responsibility for developing equally accessible alternates for websites that are determined to be noncompliant with accessibility standards.
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, 2009, through August 1, 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

DISABILITY ACCESS AND COMPLIANCE COMMITTEE

The campus Disability Access and Compliance Committee (DACC) was inactive.

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 an advisory committee on services to students with disabilities to assist in the evaluation of current campus policies and procedures relating to students with disabilities, develop plans relating to programs and services for students with disabilities, recommend priorities, review barrier removal priorities as specified in the State University Administrative Manual, and develop timelines as defined in each campus’ transition plan.

Coded Memorandum Academic Affairs (AA) 2009-27, *Policy for the Provision of Accommodations and Support to Students with Disabilities*, dated December 17, 2009, states that each campus shall establish an advisory committee on services to students with disabilities to assist in the evaluation of current campus policies relating to students with disabilities and to develop plans and recommend priorities relating to programs and services for students with disabilities.

The director of student disability services stated that the DACC had been inactive since fiscal year 2009/10 due to furloughs and restricted resources and because the campus wanted to focus on accessible technology initiative (ATI) priorities.

Failure to convene the DACC meetings increases the risk that the campus will not identify accessibility issues for facilities and programs.

**Recommendation 1**

We recommend that the campus reconvene meetings of the DACC.

**Campus Response**

We concur. The campus will reconvene DACC meetings by November 30, 2011.

POLICIES AND PROCEDURES

The campus did not have a written complaint procedure for handling allegations of discrimination, harassment, and retaliation from applicants and independent contractors.

EO 928, *Systemwide Complaint Procedure for Discrimination, Harassment and Retaliation Complaints from Employees Not Eligible to File a Complaint or Grievance Under a Collective Bargaining Agreement or Whose Collective Bargaining Agreement Incorporates CSU Systemwide Complaint Procedure*, dated January 6, 2005, states, in part, that there is no systemwide complaint
procedure for applicants and independent contractors. Consequently, each campus shall provide for these by having in place a complaint procedure to handle allegations from applicants and independent contractors. Such a procedure shall designate several persons to whom an allegation can be brought.

The interim associate vice president for administration stated that the campus utilized more generalized discrimination complaint procedures for complaints filed by applicants and independent contractors and that the procedures specific to these parties had not yet been documented and posted with the other discrimination complaint procedures.

Failure to have a written complaint procedure for handling allegations of discrimination, harassment, and retaliation from applicants and independent contractors increases the risk that complaints could be handled incorrectly and could lead to potential litigation.

**Recommendation 2**

We recommend that the campus develop and implement a written complaint procedure for handling allegations of discrimination, harassment, and retaliation from applicants and independent contractors.

**Campus Response**

We concur. The campus has developed and implemented a written complaint procedure for handling allegations of discrimination, harassment, and retaliation from applicants and independent contractors.

**PROGRAM AND PHYSICAL ACCESSIBILITY**

The campus Americans with Disabilities Act (ADA) transition plan was not updated to reflect changes in priorities, expected remediation, or improvements and/or barrier removals that were made since the plan update in 2008.

EO 926 states that the California State University campus transition plans should be updated to reflect current campus conditions. With academic program and other physical changes that have occurred over time, the transition plan should mirror the current status of the campus and be used as a planning tool to evaluate and confirm program compliance and priority of outstanding needs; listed barriers should be reviewed to assess if they a) have been removed/corrected, b) deny program access, or c) have no effect on program access.

Code of Federal Regulations Title 28, Part 35, *Nondiscrimination on the Basis of Disability in State and Local Government Services*, §150(d)(4) states that if a public entity has already complied with the transition plan requirement of a federal agency regulation implementing Section 504 of the Rehabilitation Act of 1973, then the requirements of this paragraph (d) shall apply only to those policies and practices that were not included in the previous transition plan.
The university architect and associate vice president for operations stated that priority changes were considered each year with the request for minor capital outlay allocations; however, since no projects had been funded and completed since the most recent update to the plan in 2008, no further updates had been posted.

Failure to maintain a current ADA transition plan increases the risk that the campus will not identify and remediate accessibility projects and exposes the campus to potential sanctions and litigation.

**Recommendation 3**

We recommend that the campus update its ADA transition plan to reflect changes in priorities, expected remediation, or improvements and/or barrier removals.

**Campus Response**

We concur. The ADA transition plan has been updated.

**EMPLOYEE QUALIFICATIONS AND TRAINING**

The campus did not always document nondiscrimination training for newly hired employees, nor had it developed a related refresher 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, racial, ethnic, national origin, sex, and disability discrimination), the methods of reporting discrimination, and 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 interim associate vice president for administration stated that the employees selected for review were hired prior to the adoption of revised documents retention procedures in April 2010, and therefore, proof of their affirmative action training was not available. She also stated her belief that EO 883 does not require refresher training. In addition, she stated her belief that required training is a term and condition of employment that requires participation by all employees, including represented employees, and that this requirement would trigger a potential meet-and-confer issue and would require notification to the unions.

Failure to document nondiscrimination training for newly hired 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 4

We recommend that the campus:

a. Document nondiscrimination training for newly hired staff.

b. Develop and implement a policy for refresher nondiscrimination training.

Campus Response

We concur.

a. Nondiscrimination training for newly hired staff has been documented.

b. A policy for refresher nondiscrimination training will be developed by December 31, 2011.

ACCESSIBLE TECHNOLOGY

WEB ACCESSIBILITY ENFORCEMENT

The campus had not developed and communicated enforcement and sanction procedures for web pages determined to be noncompliant with accessibility standards.

The San Diego State University (SDSU) Senate Policy on Universal Access to Information Technology Resources and Services, Part 4.3, states that appropriate sanctions shall be developed, up to and including the shutting down of inaccessible websites, and that no sanctions shall be imposed until notice has been given to the individual or unit responsible for the website, in accordance with an established process.

The chief information officer (CIO) and senior director for enterprise technology services stated his belief that the current less-formalized process of communication, with web masters as a group and with problematic page owners individually, was appropriate for the decentralized nature of the web creator community at SDSU, and that standardizing enforcement actions would be extremely difficult.

The lack of enforcement procedures for mandated web accessibility requirements increases the risk that the campus will not meet its ATI compliance deadlines, thereby increasing the risk of litigation.

Recommendation 5

We recommend that the campus develop and communicate enforcement and sanction procedures for web pages determined to be noncompliant with accessibility standards.

Campus Response

We concur. The campus will develop and communicate a plan for enforcement and possible sanctions for noncompliant websites by March 1, 2012.
EQUALLY ACCESSIBLE ALTERNATES

The campus had not developed a policy that defined responsibility for developing equally accessible alternates for websites that are determined to be noncompliant with accessibility standards.

AA-2010-13, Revision of Accessible Technology Initiative Coded Memo, dated June 14, 2010, states that if remediation of the website is not possible or would constitute an undue burden, then a plan to provide an equally effective alternate form of access must be developed, documented, and communicated.

The CIO and senior director for enterprise technology services stated his belief that the current less-formalized process of communication, with web masters as a group and with problematic page owners individually, was appropriate for the decentralized nature of the web creator community at SDSU.

A lack of clear accountability for ATI web accessibility standards increases the risk that the campus may not meet its ATI compliance deadlines, thereby increasing the risk of litigation.

Recommendation 6

We recommend that the campus develop and implement a policy that defines responsibility for developing equally accessible alternates for web pages that are determined to be noncompliant with accessibility standards.

Campus Response

We concur. The campus will develop a policy that assigns responsibility to the website owners for developing accessible alternate web pages by March 1, 2012.
### APPENDIX A:
**PERSONNEL CONTACTED**

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
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<tbody>
<tr>
<td>Elliot Hirshman</td>
<td>President</td>
</tr>
<tr>
<td>Stephen L. Weber</td>
<td>President (At time of review)</td>
</tr>
<tr>
<td>Scott Burns</td>
<td>Associate Vice President for Financial Operations</td>
</tr>
<tr>
<td>Valerie Carter</td>
<td>Audit and Tax, Financial Operations</td>
</tr>
<tr>
<td>Lauren Cooper</td>
<td>Director for Facilities Planning, Design and Construction</td>
</tr>
<tr>
<td>Maureen Dotson</td>
<td>Facilities Coordinator, Library and Information Access</td>
</tr>
<tr>
<td>Patricia Francisco</td>
<td>Director of Office of Housing Administration</td>
</tr>
<tr>
<td>Cathy Garcia</td>
<td>Manager, Contract and Procurement Management</td>
</tr>
<tr>
<td>Adrian Gonzalez</td>
<td>Information Technology Manager, Imperial Valley Campus</td>
</tr>
<tr>
<td>Patricia Griffith</td>
<td>Interpreter Coordinator, Student Disability Services</td>
</tr>
<tr>
<td>Thomas Harpole</td>
<td>Employee Relations Manager, Office of Employee Relations and Compliance</td>
</tr>
<tr>
<td>Vickie Hokenson</td>
<td>Lead Buyer III, Contract Specialist</td>
</tr>
<tr>
<td>Jim Julius</td>
<td>Associate Director of Instructional Technology Services</td>
</tr>
<tr>
<td>Juan Lagunas</td>
<td>Web Master, Imperial Valley Campus</td>
</tr>
<tr>
<td>Nancy Lopez</td>
<td>Assistant to the Vice President, Business and Financial Affairs</td>
</tr>
<tr>
<td>Irma Martinez</td>
<td>Director of Business and Financial Services, Imperial Valley Campus</td>
</tr>
<tr>
<td>Kenneth Neely</td>
<td>Instructional Technology Specialist, Imperial Valley Campus</td>
</tr>
<tr>
<td>Isidore Niyongabo</td>
<td>San Diego State University Graduate, Class of 2011</td>
</tr>
<tr>
<td>Rich Pickett</td>
<td>Chief Information Officer, Senior Director for Enterprise Technology Services</td>
</tr>
<tr>
<td>Miguel Rahiotis</td>
<td>Assistant Dean for Student Affairs, Imperial Valley Campus</td>
</tr>
<tr>
<td>Carol Redding</td>
<td>Project Manager, Accessible Technology Initiative</td>
</tr>
<tr>
<td>Jessica Rentto</td>
<td>Interim Associate Vice President for Administration</td>
</tr>
<tr>
<td>Barbara Romero</td>
<td>Academic Advisor, Imperial Valley Campus</td>
</tr>
<tr>
<td>Sally Roush</td>
<td>Vice President for Business and Financial Affairs</td>
</tr>
<tr>
<td>Marti Ruel</td>
<td>Associate Vice President for Student Services</td>
</tr>
<tr>
<td>Michael Sabath</td>
<td>Associate Dean for Academic Affairs, Imperial Valley Campus</td>
</tr>
<tr>
<td>Christy Samarkos</td>
<td>Director of Residential Education</td>
</tr>
<tr>
<td>Carl Schneider</td>
<td>Assistant Director for Physical Plant</td>
</tr>
<tr>
<td>Robert Schulz</td>
<td>University Architect and Associate Vice President for Operations</td>
</tr>
<tr>
<td>Mary Shojai</td>
<td>Director of Student Disability Services</td>
</tr>
<tr>
<td>Barbara Strumsky</td>
<td>Director of Finance, College of Extended Studies</td>
</tr>
<tr>
<td>Todd Summer</td>
<td>Director, Campus Stores Division, Aztec Shops</td>
</tr>
<tr>
<td>Jan Wahl</td>
<td>Associate Dean, College of Extended Studies</td>
</tr>
</tbody>
</table>
October 25, 2011

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

Dear Mr. Mandel:

Attached is San Diego State University’s response to Audit Report 11-47, 
Americans with Disabilities Act Compliance. Documentation of policy and control changes will follow under separate cover.

Should you have any questions or require additional information, please contact Valerie Carter, Audit and Tax Director, at 619-594-5901.

Sincerely,

Sally F. Roush
Vice President, Business and Financial Affairs

Attachment

c: Elliot Hirshman, President
Marti Ruel, Associate Vice President, Student Services
Jessica Rentto, Interim Associate Vice President, Administration
Scott Burns, Associate Vice President, Financial Operations
Robert Schulz, Associate Vice President, Operations
Mary Shojaei, Director, Student Disability Services
Rich Pickett, Senior Director and CIO, Enterprise Technology Services
Valerie Carter, Director, Audit and Tax
AMERICANS WITH DISABILITIES ACT COMPLIANCE

SAN DIEGO STATE UNIVERSITY

Audit Report 11-47

GENERAL ENVIRONMENT

DISABILITY ACCESS AND COMPLIANCE COMMITTEE

Recommendation 1

We recommend that the campus reconvene meetings of the DACC.

Campus Response

We concur. The campus will reconvene DACC meetings by November 30, 2011.

POLICIES AND PROCEDURES

Recommendation 2

We recommend that the campus develop and implement a written complaint procedure for handling allegations of discrimination, harassment, and retaliation from applicants and independent contractors.

Campus Response

We concur. The campus has developed and implemented a written complaint procedure for handling allegations of discrimination, harassment, and retaliation from applicants and independent contractors.

PROGRAM AND PHYSICAL ACCESSIBILITY

Recommendation 3

We recommend that the campus update its ADA transition plan to reflect changes in priorities, expected remediation, or improvements and/or barrier removals.

Campus Response

We concur. The ADA transition plan has been updated.
EMPLOYEE QUALIFICATIONS AND TRAINING

Recommendation 4

We recommend that the campus:

a. Document nondiscrimination training for newly hired staff.
b. Develop and implement a policy for refresher nondiscrimination training.

Campus Response

We concur.

a. Nondiscrimination training for newly hired staff has been documented.
b. A policy for refresher nondiscrimination training will be developed by December 31, 2011.

ACCESSIBLE TECHNOLOGY

WEB ACCESSIBILITY ENFORCEMENT

Recommendation 5

We recommend that the campus develop and communicate enforcement and sanction procedures for web pages determined to be noncompliant with accessibility standards.

Campus Response

We concur. The campus will develop and communicate a plan for enforcement and possible sanctions for non-compliant web sites by March 1, 2012.

EQUALLY ACCESSIBLE ALTERNATES

Recommendation 6

We recommend that the campus develop and implement a policy that defines responsibility for developing equally accessible alternates for web pages that are determined to be noncompliant with accessibility standards.

Campus Response

We concur. The campus will develop a policy that assigns responsibility to the web site owners for developing accessible alternate web pages by March 1, 2012.
November 14, 2011

MEMORANDUM

TO: Mr. Larry Mandel
University Auditor

FROM: Charles B. Reed
Chancellor

SUBJECT: Draft Final Report 11-47 on
Americans with Disabilities Act Compliance
San Diego State University

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, San Diego State University.

CBR/amd