AMERICANS WITH DISABILITIES ACT COMPLIANCE

CALIFORNIA STATE UNIVERSITY,
CHANNEL ISLANDS

Audit Report 11-48
November 17, 2011

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THE CALIFORNIA STATE UNIVERSITY
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# ABBREVIATIONS

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<tr>
<td>AA</td>
<td>Academic Affairs</td>
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<tr>
<td>ACT</td>
<td>Accessibility Coordination Team</td>
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<tr>
<td>ADA</td>
<td>Americans With Disabilities Act</td>
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<tr>
<td>ATI</td>
<td>Accessible Technology Initiative</td>
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<tr>
<td>CSU</td>
<td>California State University</td>
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<tr>
<td>E&amp;IT</td>
<td>Electronic and Information Technology</td>
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<tr>
<td>EO</td>
<td>Executive Order</td>
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<td>IM</td>
<td>Instructional Materials</td>
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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, Channel Islands campus from August 22, 2011, through September 16, 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: advisory committee on disability programs, 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 September 16, 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 Accessibility Coordination Team needed improvement. For example, the team was not meeting on a regular basis and the campus had not performed a risk assessment or other formal evaluation to determine which topics should be included in the team meeting agendas.

PROGRAM AND PHYSICAL ACCESSIBILITY [9]

The campus had not formalized a transition plan to record changes in priorities of completed, planned, or pending physical accessibility projects identified in surveys that were completed by the campus in 2001 and 2009.

EMPLOYEE QUALIFICATIONS AND TRAINING [10]

Americans with Disabilities Act (ADA) compliance training processes needed improvement. For example, the non-faculty new-hire orientation, the main forum for ADA and non-discrimination training,
was conducted infrequently, and student and casual employees were not required to attend it. Also, the orientation for newly hired faculty members contained training on ADA topics, but it was not commensurate to the training provided in the non-faculty new-hire orientation. Finally, the campus had not conducted training on the electronic and information technology procurement process or employee refresher training on ADA compliance.

**ACCESSIBLE TECHNOLOGY [11]**

The campus had not clearly defined programmatic responsibilities for the instructional materials component of the accessible technology initiative, nor were policies and procedures in place to ensure the accessibility of instructional materials.
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.
PURPOSE

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 September 16, 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 Accessibility Coordination Team (ACT) needed improvement.

We noted that:

- The team did not meet on a regular basis, and meeting minutes were not consistently documented.

- The campus had not performed a risk assessment or other formal evaluation to determine which topics should be included in the team meeting agendas.

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.

EO 715, *California State University Risk Policy*, dated October 27, 1999, requires the campus to ensure that appropriate risk identification, analysis, and management processes are in place.

The director of human resources employment practices stated his belief that the frequency of the meetings was sufficient due to the overlap in related committee membership and the quality and frequency of informal communication. Also, he stated his belief that EO 715 does not require a separate risk assessment independent of campuswide risk management efforts and specific to the Americans with Disabilities Act (ADA).

Failure to convene consistent, comprehensive, and documented disability advisory committee meetings or perform adequate risk assessments increases the risk that the campus will not identify accessibility issues for facilities and programs.

**Recommendation 1**

We recommend that the campus:

a. Determine an appropriate meeting frequency, and consistently document meeting minutes.
b. Conduct a risk assessment or other formal evaluation to determine which topics should be included in team meeting agendas.

**Campus Response**

We concur.

a. We will determine an appropriate meeting frequency and consistently document meeting minutes no later than April 1, 2012.

b. We will conduct a risk assessment or other formal evaluation to determine which topics should be included in team meeting agendas no later than April 1, 2012.

**PROGRAM AND PHYSICAL ACCESSIBILITY**

The campus had not formalized a transition plan to record changes in priorities of completed, planned or pending physical accessibility projects identified in surveys that were completed by the campus in 2001 and 2009.

EO 926, *The California State University Board of Trustees Policy on Disability Support and Accommodations*, dated December 20, 2004, states that the California State University (CSU) 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.

The director of planning, design, and construction stated that because the campus has been in a perpetual state of renovation for almost ten years, information regarding the status of ADA improvements was consistently addressed, but that the information had not been formalized into a transition plan due to time constraints and conflicting priorities.

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 2**

We recommend that the campus formalize a transition plan to record changes in priorities of completed, planned, or pending physical accessibility projects.

**Campus Response**

We concur. The campus has begun updating the transition plan. The survey will be completed by January 31, 2012, and the report will be completed by April 30, 2012.
EMPLOYEE QUALIFICATIONS AND TRAINING

ADA compliance training processes needed improvement.

We noted that:

- The ADA compliance training content in the non-faculty new-hire orientation, conducted by the office of human resources employment practices, was comprehensive, but the orientation was conducted infrequently. Specifically, the last orientation session was held in October 2010, and the campus had hired 44 non-faculty employees since that date. Moreover, two of the four non-faculty employees hired prior to October 2010 that we reviewed had not attended the orientation.

- Student employees and hires categorized as “casual employees” were not required to attend the non-faculty new-hire orientation, which was the main forum for ADA and non-discrimination training.

- Newly hired faculty members were required to attend an orientation conducted by academic affairs, but the subject matter related to ADA was not commensurate to the training provided in the non-faculty new-hire orientation.

- The campus had not conducted training on the electronic and information technology (E&IT) procurement process.

- The campus had not conducted employee refresher training on ADA compliance.

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 associate vice president of human resources stated that orientation was generally conducted once per semester, but that it was decided that only one session was needed between October 2010 and October 2011 because of organizational changes taking place. She also stated that student and casual workers were excluded from the new-hire orientation because they are generally short-term, function-specific employees, and that the situations causing the two non-faculty employees to miss the scheduled orientation were unique to each of those individuals. She also stated her belief that academic affairs was the appropriate place for faculty training, and that the training content was sufficient given the population. She also stated that training was not conducted campuswide on the procurement process because the process was well documented and available on public websites. Finally, she stated her belief that EO 883 does not require refresher training.
Failure to ensure that all employees receive adequate training in ADA nondiscrimination topics increases the risk that employees will not be fully aware of ADA nondiscrimination procedures and requirements, thereby increasing the risk of litigation.

Recommendation 3

We recommend that the campus:

a. Increase the frequency of non-faculty new-hire orientation and ensure attendance by all new employees.

b. Require student and casual employees to attend new-hire orientation.

c. Ensure that faculty orientation includes ADA non-discrimination training that is commensurate to the training provided in the non-faculty new-hire orientation.

d. Conduct training on the E&IT procurement process.

e. Conduct employee refresher training on ADA compliance.

Campus Response

We concur.

a. We will increase the frequency of non-faculty new-hire orientations and ensure attendance by all new employees by April 2012.

b. Key campus stakeholders will meet December 20, 2011, to discuss development of a new-hire student assistant and casual worker training program that will include ADA compliance training. Implementation is expected by April 2012.

c. New faculty orientation will be held August 22-23, 2012. The reason for this is that these will be the first days that newly hired faculty will be in work status.

d. We will conduct training on the E&IT procurement process by April 30, 2012.

e. The Channel Islands training unit and director of HR employment practices will establish an ADA refresher training program by April 30, 2012.

ACCESSIBLE TECHNOLOGY

The campus had not clearly defined programmatic responsibilities for the instructional materials (IM) component of the accessible technology initiative (ATI), nor were policies and procedures in place to ensure the accessibility of instructional materials.
We noted that:

- Leadership for the IM component of the ATI was inconsistent and not assigned in accordance with CSU policy (i.e., to the chair of the faculty senate or designee). Also, there had not been a lead for this area for nearly three years.

- The campus did not have a detailed implementation plan or an equally effective alternate plan for IM.

- The campus did not have policies and procedures that held faculty accountable for ensuring that their course design and IM were accessible to students with disabilities.

- Faculty development did not offer training and guidance on how to make IM accessible to students with disabilities.

- The ATI Steering Committee was not convening meetings focused only on ATI activities, but instead was addressing ATI issues during ACT meetings. Moreover, we reviewed ACT meeting minutes and found that instructional materials issues were not discussed at every meeting.

AA 2010-13, *Revision of Accessible Technology Initiative Coded Memo*, dated June 14, 2010, states that the faculty senate chair or their designee should be a member of the ATI Steering Committee and act as chair for the IM task force. The policy also states that ATI implementation should be achieved through continuous progress that is planned, measured, and documented; if accessibility 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; it is the responsibility of the academic and faculty senates to support ATI with appropriate policy changes and additions; and expectations and responsibilities for campus executive sponsors in the implementation of ATI include convening a campuswide ATI steering committee. Appendix C further states that it is the responsibility of the center for faculty development to coordinate or play an active role in providing training in ATI related subjects for faculty, and to participate in relevant campus ATI committees.

The director of human resources employment practices stated that despite making multiple requests for representation over several years, he had been unable to obtain an ATI IM lead for more than a month or so since January 2008. He also stated that the turnover and gaps in leadership for the IM portion of the ATI contributed to the lack of implementation of many of the required elements of the ATI. Finally, he stated his belief that coverage of ATI topics in the separate advisory committee on disability services was sufficient. The vice president for academic affairs stated that recruitment of an appropriate tenured faculty member for IM leadership has proven difficult due to the declining number of faculty and the increased workload this assignment would entail.

Failure to effectively manage all components of the ATI increases the risk that campus programs, services, and activities will not be fully accessible to all individuals.
Recommendation 4

We recommend that the campus:

a. Assign leadership for the ATI’s IM component in accordance with CSU policy.

b. Develop and document a detailed implementation plan or an equally effective alternate plan for IM.

c. Develop, document, and communicate policies and procedures that hold faculty accountable for ensuring that their course design and IM are accessible to students with disabilities.

d. Ensure that faculty development offers appropriate training and guidance on how to make IM accessible to students with disabilities.

e. Convene ATI Steering Committee meetings that are focused on ATI activities.

Campus Response

We concur.

a. We will assign leadership for the ATI’s IM component in accordance with CSU policy by February 15, 2012.

b. We will develop and document a detailed implementation plan or an equally effective alternate plan for IM by April 30, 2012.

c. We will develop, document, and communicate policies and procedures that hold faculty accountable for ensuring that their course design and IM are accessible to students with disabilities by April 30, 2012.

d. We will ensure that faculty development offers appropriate training and guidance on how to make IM accessible to students with disabilities by April 30, 2012.

e. We will convene ATI Steering Committee meetings that are separate from other campus accessibility meetings and focus solely on ATI activities. The meetings will convene by March 2012.
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<thead>
<tr>
<th>Name</th>
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<tbody>
<tr>
<td>Richard R. Rush</td>
<td>President</td>
</tr>
<tr>
<td>Pamela Abbott-Mouchou</td>
<td>Executive Administrative Assistant</td>
</tr>
<tr>
<td>Gary A. Berg</td>
<td>Associate Vice President and Dean, Extended University</td>
</tr>
<tr>
<td>Michael Berman</td>
<td>Interim Vice President of Finance and Administration, Chief Information Officer (At time of review)</td>
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<tr>
<td>David Carlson</td>
<td>Associate Architect</td>
</tr>
<tr>
<td>David Chakraborty</td>
<td>Associate Vice President of Operations, Planning and Construction</td>
</tr>
<tr>
<td>Renny Christopher</td>
<td>Vice President for Academic Affairs</td>
</tr>
<tr>
<td>Valeri Cirino-Paez</td>
<td>Assistant Director, Disability Resource Programs</td>
</tr>
<tr>
<td>Jeff Cowgill</td>
<td>Police Sergeant</td>
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<tr>
<td>Cindy Derrico</td>
<td>Director of Housing and Residential Education</td>
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<tr>
<td>Caroline Doll</td>
<td>Director of Special Projects, Finance and Administration</td>
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<tr>
<td>Margaret Driscoll</td>
<td>Course Reserve Coordinator</td>
</tr>
<tr>
<td>Diana Enos</td>
<td>Human Resources Manager</td>
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<tr>
<td>Judy Frazier</td>
<td>Administrative Analyst, Information Technology</td>
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<tr>
<td>Jerry Garcia</td>
<td>Information Technology Consultant</td>
</tr>
<tr>
<td>John Gormley</td>
<td>Director of Planning, Design and Construction</td>
</tr>
<tr>
<td>Debbie Gravelle</td>
<td>Assistant to the Dean of Students</td>
</tr>
<tr>
<td>Arjelia Guillen</td>
<td>Disability Accommodations Counselor</td>
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<tr>
<td>Missy Jarnagin</td>
<td>Associate Vice President, Finance and Budget</td>
</tr>
<tr>
<td>Brianne Keighley</td>
<td>Admissions, Records and Advising Specialist, Extended University</td>
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<tr>
<td>Liz Miller</td>
<td>Associate Director, Residential Education</td>
</tr>
<tr>
<td>Peter Mosinsksis</td>
<td>Academic and Information Technology Project Supervisor</td>
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<tr>
<td>Anna Pavin</td>
<td>Associate Vice President, Human Resources</td>
</tr>
<tr>
<td>Damien Pena</td>
<td>Associate Vice President of Student Affairs, Dean of Students</td>
</tr>
<tr>
<td>Ray Porras</td>
<td>Director, Transportation and Parking Services</td>
</tr>
<tr>
<td>Cathy Strauch</td>
<td>Technical Contract Specialist</td>
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<tr>
<td>JoAnn Stuermer</td>
<td>Human Resources Recruitment and Training Specialist</td>
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<tr>
<td>Judy Swanson</td>
<td>Director of Academic Technology</td>
</tr>
<tr>
<td>Ysabel Trinidad</td>
<td>Vice President, Finance and Administration (Currently)</td>
</tr>
<tr>
<td>Dan Wakelee</td>
<td>Assistant Provost</td>
</tr>
<tr>
<td>Eddie Washington</td>
<td>Director of Human Resources Employment Practices</td>
</tr>
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December 20, 2011

Mr. Larry Mandel
University Auditor
The California State University
401 Golden Shore, 4th Floor
Long Beach, CA 90802-4200

RE: Campus Responses to Recommendations: Audit Report 11-48-American's with Disabilities Act Compliance

Dear Mr. Mandel,

Enclosed is our response to the recommendations found in the Audit Report 11-48-American's with Disabilities Act Compliance at California State University Channel Islands. Upon acceptance of our response, we will follow up with your office to provide supporting documentation for each of the recommendations by the anticipated completion dates.

Please let us know if you have any questions or need additional information.

Sincerely,

Ysabel Trinidad
Vice President for Finance and Administration

Enclosure

cc: President Richard Rush
AMERICANS WITH DISABILITIES ACT COMPLIANCE

CALIFORNIA STATE UNIVERSITY,
CHANNEL ISLANDS

Audit Report 11-48

GENERAL ENVIRONMENT

Recommendation 1

We recommend that the campus:

a. Determine an appropriate meeting frequency, and consistently document meeting minutes.

b. Conduct a risk assessment or other formal evaluation to determine which topics should be included in team meeting agendas.

Campus Response

a. We concur. We will determine an appropriate meeting frequency and consistently document meeting minutes no later than April 1, 2012.

b. We concur. We will conduct a risk assessment or other formal evaluation to determine which topics should be included in team meeting agendas no later than April 1, 2012.

PROGRAM AND PHYSICAL ACCESSIBILITY

Recommendation 2

We recommend that the campus formalize a transition plan to record changes in priorities of completed, planned, or pending physical accessibility projects.

Campus Response

We concur. The Campus has begun updating the transition plan. The survey will be completed by January 31, 2012, and the report will be completed by April 30, 2012.
EMPLOYEE QUALIFICATIONS AND TRAINING

Recommendation 3

We recommend that the campus:

a. Increase the frequency of non-faculty new-hire orientation and ensure attendance by all new employees.

b. Require student and casual employees to attend new-hire orientation.

c. Ensure that faculty orientation includes ADA non-discrimination training that is commensurate to the training provided in the non-faculty new-hire orientation.

d. Conduct training on the E&IT procurement process.

e. Conduct employee refresher training on ADA compliance.

Campus Response

a. We concur. We will increase the frequency of non-faculty new-hire orientations and ensure attendance by all new employees by April 2012.

b. We concur. Key campus stakeholders will meet December 20, 2011 to discuss development of a new hire student assistant and casual worker training program that will include ADA compliance training. Implementation expected by April 2012.

c. We concur. New faculty orientation will be held Aug. 22-23, 2012. The reason for this is that these will be the first days that newly hired faculty will be in work status.

d. We concur. We will conduct training on the E&IT procurement process by April 30, 2012.

e. We concur. The CI training unit and Director of HR Employment Practices will establish an ADA refresher training program by April 30, 2012.

ACCESSIBLE TECHNOLOGY

Recommendation 4

We recommend that the campus:

a. Assign leadership for the ATI’s IM component in accordance with CSU policy.

b. Develop and document a detailed implementation plan or an equally effective alternate plan for IM.

c. Develop, document, and communicate policies and procedures that hold faculty accountable for ensuring that their course design and IM are accessible to students with disabilities.
d. Ensure that faculty development offers appropriate training and guidance on how to make IM accessible to students with disabilities.

e. Convene ATI Steering Committee meetings that are focused on ATI activities.

Campus Response

a. We concur. We will assign leadership for the ATI’s IM component in accordance with CSU policy by February 15, 2012.

b. We concur. We will develop and document a detailed implementation plan or an equally effective alternate plan for IM by April 30, 2012.

c. We concur. We will develop, document, and communicate policies and procedures that hold faculty accountable for ensuring that their course design and IM are accessible to students with disabilities by April 30, 2012.

d. We concur. We will ensure that faculty development offers appropriate training and guidance on how to make IM accessible to students with disabilities by April 30, 2012.

e. We concur. We will convene ATI Steering Committee meetings that are separate from other campus accessibility meetings and focus solely on ATI activities. The meetings will convene by March 2012.
February 6, 2012

MEMORANDUM

TO: Mr. Larry Mandel
    University Auditor

FROM: Charles B. Reed
       Chancellor

SUBJECT: Draft Final Report 11-48 on
         Americans with Disabilities Act Compliance
         California State University, Channel Islands

In response to your memorandum of February 6, 2012, I accept the response as
submitted with the draft final report on Americans with Disabilities Act
Compliance, California State University, Channel Islands.

CBR/amd