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March 27, 2020

Mr. Framroze M. Virjee, President  
California State University, Fullerton  
800 N. State College Boulevard  
Fullerton, CA 92834

Dear Mr. Virjee:

**Subject: Audit Report 19-91, Accessible Technology, California State University, Fullerton**

We have completed an audit of *Accessible Technology* as part of our 2019 Audit Plan, and the final report is attached for your reference. The audit was conducted in accordance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*.

I have reviewed the management response and have concluded that it appropriately addresses our recommendations. The management response has been incorporated into the final audit report, which has been posted to Audit and Advisory Services' website. We will follow-up on the implementation of corrective actions outlined in the response and determine whether additional action is required.

Any observations not included in this report were discussed with your staff at the informal exit conference and may be subject to follow-up.

I wish to express my appreciation for the cooperation extended by the campus personnel over the course of this review.

Sincerely,



Larry Mandel  
Vice Chancellor and Chief Audit Officer

c: Timothy P. White, Chancellor

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# **ACCESSIBLE TECHNOLOGY**

**California State University,  
Fullerton**

Audit Report 19-91  
February 24, 2020

## EXECUTIVE SUMMARY

### OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of operational and administrative controls related to the California State University (CSU) Accessible Technology Initiative (ATI) and to ensure compliance with relevant federal and state regulations; Trustee policy; Office of the Chancellor (CO) directives; and campus procedures. The CSU ATI provides guidelines for compliance with regulations related to the implementation and monitoring of this federal statute.

### CONCLUSION

Based upon the results of the work performed within the scope of the audit, except for the weaknesses described below, the operational and administrative controls for ATI as of December 5, 2019, taken as a whole, provided reasonable assurance that risks were being managed and objectives were met.

California State University, Fullerton had established a governance and organizational structure to ensure that departments complied with CSU ATI policies and procedures. The ATI executive sponsor and steering committee provided oversight of the instructional materials, procurement, and website accessibility focus-area teams to implement their ATI practices across campus. However, our audit procedures identified areas where improvement could be made to the existing control environment, such as creating a comprehensive annual ATI Plan and providing better compliance metrics of the accessibility of materials in the learning management system.

Specific observations, recommendations, and management responses are detailed in the remainder of this report.

## **OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES**

### **1. CAMPUS ATI PLAN**

#### **OBSERVATION**

The campus had not completed the annual campus ATI plan, as required by Coded memorandum Academic Affairs (AA) 2013-03, *Accessible Technology Initiative*, and its amendment, AA-2015-22.

We observed that the campus had completed the ATI annual reports for each focus area but had not completed the required ATI plan.

AA-2013-03, *Accessible Technology Initiative*, states that the campus executive sponsor should engage in a periodic administrative review process with the ATI steering committee regarding challenges, milestones, resources, and documentation of ongoing progress. The executive sponsor working with the campus ATI steering committee reviews and updates the ATI campus plan to guide implementation.

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

#### **RECOMMENDATION**

We recommend that the campus create an ATI plan to outline the steps needed for annual improvement of the campus accessible technology compliance program.

#### **MANAGEMENT RESPONSE**

We concur. The campus will create an ATI plan to outline the steps needed for annual improvement of the campus accessible technology compliance program.

The anticipated completion date is August 24, 2020.

### **2. LEARNING MANGEMENT SYSTEM DOCUMENT ACCESSIBILITY**

#### **OBSERVATION**

The campus had implemented software to help determine whether instructional materials in the Learning Management System (LMS) were accessible. However, we found that:

The campus did not have monitoring procedures in place, including the use of metrics, to ensure that accessibility of instructional materials placed into the LMS was improving.

**RECOMMENDATION**

We recommend that the campus develop documented procedures, including faculty training and the use of metrics/system reports, to monitor the accessibility of instructional materials in LMS to ensure improvements are achieved.

**MANAGEMENT RESPONSE**

We concur. The campus will develop documented procedures that address, among other things, faculty training and the use of metrics/system reports, to monitor the accessibility of instructional materials in LMS to ensure improvements are achieved.

The anticipated completion date is August 24, 2020.

## GENERAL INFORMATION

### BACKGROUND

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 (EO) 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 the ATI in order to develop the work plan, guidance, and resources to assist campuses in carrying out the accessible technology (AT) provisions of its revised *Policy on Disability Support and Accommodations*. CSU ATI plans are continuously developing and were revised and extended through policy every year from 2007 to 2014 based on experiences reported by the campuses and the understanding that ATI requirements and milestones should be flexible, allowing campuses to follow different plans for accomplishing them. It is anticipated that the ATI will continue to evolve as new needs are identified.

In January 2013, the CSU issued AA-2013-3, *Accessible Technology Initiative*, to provide campuses with guidance for implementing AT. The memorandum establishes responsibilities and outlines overall governance, specified project planning, and established implementation timelines.

In December 2015, the CSU amended AA-2013-03 by issuing AA-2015-22, to enhance the guidance by outlining specific systemwide activities and responsibilities of the CO ATI department, and enhancing the reporting requirements to include annual reporting to both the CO ATI department and the campus president.

In May 2018, the CSU issued EO 1111, which supersedes EO 926.

At California State University, Fullerton, the ATI executive sponsor is the vice president (VP) of information technology (IT)/chief information officer (CIO), who is at a level appropriate to ensure that the ATI program is led by a campus official with the authority to direct staff across different campus departments. Additionally, as a member of the president's cabinet, the VP

of IT/CIO is able to inform senior-level campus administrators of the overall progress, accomplishments, and challenges of the program. A steering committee has been established to oversee progress. The ATI program on campus is divided between three main focus areas: instructional materials, procurement, and website accessibility. Each of these focus groups work to implement and improve specific aspects related to accessibility.

## SCOPE

We visited the California State University, Fullerton campus from November 4, 2019, through December 5, 2019. Our audit and evaluation included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. The audit focused on procedures in effect from January 1, 2017 to December 5, 2019.

Specifically, we reviewed and tested:

- Monitoring of the quality and effectiveness of campus ATI program services.
- Resolution of complaints and grievances relating to program accessibility.
- Qualifications of services to students with disabilities staff and campuswide training practices.
- Provision of reasonable technology access and accommodations to applicants and employees.
- Provision of programs, services, and activities that are readily accessible to disabled individuals.
- Ongoing updates and monitoring of the ATI implementation plan.
- Prioritization of ATI implementation tasks and plans.
- Development, documentation, and communication of equally effective alternative access.
- Adequacy of ATI training.
- Compliance with the accessible electronic and information technology procurement program.

The Americans with Disabilities Act is broad in its scope. In this review, we focused on compliance with Section 508, which the CSU refers to ATI. The scope included both student and employee accessibility. Specific areas reviewed included overall governance and responsibility for implementing the initiative, as well as the three key components of ATI: website accessibility, procurement, and instructional materials. Our review included compliance with Trustee policy, federal and state directives, and campus policies and procedures; technological compliance; procedures for handling complaints; communication; and employee training.

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.

Our testing and methodology, which was designed to provide a review of key operational and administrative controls, included interviews, walkthroughs, and detailed testing on certain aspects of the ATI program. The review was limited to gaining reasonable assurance that essential elements of the HS program were in place and did not examine all aspects of the program.

## CRITERIA

Our audit was based upon standards as set forth in federal and state regulations and guidance; Trustee policy; Office of the Chancellor directives; and campus procedures; as well as sound administrative practices and consideration of the potential impact of significant risks. This audit was conducted in conformance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*.

This review emphasized, but was not limited to, compliance with:

- EO 1111, *The California State University Board of Trustees Policy on Disability Support and Accommodations*
- AA-2015-22, *Accessible Technology Initiative: Amendment to AA-2013-03*
- AA-2013-03, *Accessible Technology Initiative*

## AUDIT TEAM

IT Audit Manager: Greg Dove  
Senior IT Auditor: Ernesto Pangilinan