

Audit and Advisory Services
401 Golden Shore
Long Beach, CA 90802-4210

January 23, 2024

Dr. Berenecea Johnson Eanes, President
California State University, Los Angeles
5151 State University Drive
Los Angeles, CA 90032

Dear Dr. Johnson Eanes:

Subject: Audit Report 23-72, Accessible Technology, California State University, Los Angeles

We have completed an audit of *Accessible Technology* as part of our 2023-2024 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 will be 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,



Vlad Marinescu
Vice Chancellor and Chief Audit Officer

c: Mildred García, Chancellor
Yammilette Rodriguez, Chair, Committee on Audit
Jean Picker Firstenberg, Vice Chair, Committee on Audit

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ACCESSIBLE TECHNOLOGY

**CALIFORNIA STATE UNIVERSITY,
LOS ANGELES**

**AUDIT REPORT 23-72
JANUARY 23, 2024**

EXECUTIVE SUMMARY

AUDIT OBJECTIVES AND BACKGROUND

In accordance with the fiscal year (FY) 2023-24 Audit Plan, as approved by the Board of Trustees, Audit and Advisory Services performed an audit of accessible technology at California State University, Los Angeles (Cal State LA).

The objectives of the audit were to ascertain the effectiveness of operational and administrative controls for the 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 California State University (CSU) ATI provides guidelines for compliance with regulations related to the implementation and monitoring of the federal statute.

OVERALL 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 October 17, 2023, taken as a whole, provided reasonable assurance that risks were being managed and objectives were met.

AUDIT SCOPE AND RESULTS

In general, we found that ATI operations were effective and services provided were in compliance with CSU policies and procedures. However, our review noted areas for improvement related to the accessibility of websites and instructional materials. Specifically, we found that accessibility issues identified in websites managed outside of the campus content management system were not always remediated in a timely manner. In addition, the campus process for scanning websites could be improved as website attachments were not scanned for accessibility.

A summary of the observations noted in the report is presented below. Further details are specified in the remainder of the report.

Area	Processes Reviewed	Audit Assessment
Program Oversight	Oversight of ATI program, ATI policy, annual ATI plan and report, and ATI complaint process	<i>Effective – no reportable observations noted</i>
Website Accessibility	Website development overview, website accessibility scanning and remediation procedures, and creation of accessible websites training	<i>Observation noted in the areas of website accessibility remediation and accessible creation training</i>
Procurement	Policies and procedures for electronic and information technology purchases, and training for accessible technology purchase requirements	<i>Effective – no reportable observations noted</i>
Instructional Materials	Scanning and remediation of learning management system (LMS) courses and instructional materials (documents, video, and audio)	<i>Observation noted in the areas of scanning and remediation courses and instructional materials</i>

The audit focused on procedures in effect from July 1, 2022, through October 17, 2023. Our audit and evaluation included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. Our review was limited to gaining reasonable assurance that essential elements of ATI were in place and did not examine all aspects of the program.

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. WEBSITE COMPLIANCE MONITORING

OBSERVATION

The campus practice for addressing accessibility in websites hosted outside of the campus content management system (CMS) required improvement. In addition, we noted that the campus process for training content managers not using the campus CMS required improvement.

We found that:

- The campus process to scan websites for accessibility issues did not always ensure that identified issues were remediated in a timely manner. Information technology services (ITS) accessibility services provided scan results to the website content administrators outside of the campus CMS; however, we found that the administrators maintaining websites outside the campus CMS had not addressed accessible issues for the past three months.
- The campus did not ensure that all staff members were required to take accessibility training before getting access to administer websites outside the official campus CMS.

Remediation of website accessibility issues helps ensure compliance with accessibility standards. Additionally, comprehensive accessibility training for content administrators helps ensure that website content is accessible before it is published.

RECOMMENDATION

We recommend that the campus:

- a. Update the process to ensure that website accessibility issues are addressed in a timely manner and consider moving all websites into the official campus CMS.
- b. Provide website accessibility training for all content administrators outside the official campus CMS.

MANAGEMENT RESPONSE
<p>The campus will:</p> <ol style="list-style-type: none">a. Update the process to ensure that website accessibility issues are addressed in a timely manner and consider moving all websites into the official campus CMS.b. Provide website accessibility training for all content administrators outside the official campus CMS. <p>Estimated completion date: June 30, 2024</p>

2. DOCUMENT COMPLIANCE MONITORING

OBSERVATION

The campus did not have a process to routinely scan documents on the campus website for accessibility compliance.

The campus used scanning software to determine whether a website and its textual content were compliant; however, the process did not include scanning attached documents in formats such as Microsoft Word, Microsoft Excel, and PDF. In addition, we noted that the campus did not have a formalized process to scan documents before uploading them to the campus website.

Implementing processes to evaluate whether documents are accessible before they are uploaded to the campus website and monitoring ongoing compliance helps to ensure that the campus is consistently providing materials that are compliant with accessibility standards.

RECOMMENDATION

We recommend that the campus:

- a. Routinely scan all documents on the website for accessibility compliance.
- b. Implement a process to review digital content accessibility before publishing on the campus website.

MANAGEMENT RESPONSE
<p>The campus will:</p> <ol style="list-style-type: none">a. Routinely scan all documents on the website for accessibility compliance.b. Implement a process to review digital content accessibility before publishing on the campus website. <p>Estimated completion date: June 30, 2024</p>

3. INSTRUCTIONAL MATERIAL ACCESSIBILITY

OBSERVATION

The campus process for ensuring instructional material accessibility required improvement.

The campus used the software product Ally to identify materials that were not compliant with accessibility goals. Those reports were made available to the faculty, but the campus did not have a process to ensure that the identified non-compliant instructional materials were remediated.

Implementing processes to evaluate whether documents are accessible before they are uploaded into the Learning Management System ensures that the campus is consistently providing instructional materials that are compliant with accessibility standards.

RECOMMENDATION

We recommend that the campus implement procedures to ensure that all instructional materials are compliant.

MANAGEMENT RESPONSE

The campus will implement procedures to ensure that all instructional materials are compliant.

Estimated completion date: June 30, 2024

GENERAL INFORMATION

ADDITIONAL 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 its 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 Coded memorandum Academic Affairs (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. In March 2021, the CO updated AA-2015-22; it became the *Accessible Technology Initiative Policy*, which supersedes all preceding coded memorandums.

At Cal State LA, the responsibility for establishing and maintaining an effective ATI program resides with the executive sponsors of the steering committee. The co-executive sponsors are the associate vice president and chief information officer for ITS and the associate vice president for faculty affairs. Steering committee members include key stakeholders from a variety of groups across the campus, including the Center for Effective Teaching and Learning, the Office for Students with Disabilities, human resources, the academic senate, procurement, and the library. Steering committee responsibilities include compiling and

submitting an annual report to the CO on the status indicator levels for ATI objectives at Cal State LA.

The Americans with Disabilities Act is broad in its scope, but we focused on compliance with Section 508, which the CSU refers to as AT. The scope included both student and employee accessibility. Specific areas reviewed included overall governance and responsibility for implementing the initiative, as well as review of the three key components of ATI: website accessibility, procurement, and instructional materials. Our review included compliance with Trustee policy, federal and state directives, campus policies and procedures, technological compliance, procedures for handling complaints, and 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 was designed to provide a review of key operational and administrative controls, included interviews, walkthroughs, and detailed testing on certain aspects of the accessible technology program. The review was limited to gaining reasonable assurance that essential elements of the 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*
- *Accessible Technology Initiative Policy*

AUDIT TEAM

Information Technology Audit Manager: Dave White
Senior Information Technology Auditor: Ernesto Pangilinan