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## **MEMORANDUM**

**DATE:** September 17, 2009

**TO:** CSU Presidents and campus communities

**FROM:** Jeri Echeverria   
Executive Vice Chancellor  
and Chief Academic Officer

Benjamin F. Quillian   
Executive Vice Chancellor  
and Chief Financial Officer

**SUBJECT:** REVISED CODED MEMO – AUTOMATIC EXTENSION OF ACCESSIBLE TECHNOLOGY INITIATIVE REQUIREMENTS

This Coded Memorandum establishes an automatic extension of the timelines and required actions for implementation of the Accessible Technology Initiative (ATI), as specified in Coded Memo AA-2007-04.

### **Background**

In 2007, Coded Memorandum AA-2007-04 set out specific timelines with required milestones for the accomplishment of goals related to ATI implementation on campuses. The Coded Memo also set out deadlines for campuses to submit initial plans and then reports in the three ATI priority areas: Web Accessibility, Instructional Materials Accessibility and Electronic and Information Technology Procurement. The CSU campuses have developed comprehensive and substantive plans, and the annual reports that have since been submitted indicate that significant accomplishments have been made towards achieving the ATI goals in each of these priority areas.

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**CSU Campuses**  
Bakersfield  
Channel Islands  
Chico  
Dominguez Hills  
East Bay

Fresno  
Fullerton  
Humboldt  
Long Beach  
Los Angeles  
Maritime Academy

Monterey Bay  
Northridge  
Pomona  
Sacramento  
San Bernardino  
San Diego

San Francisco  
San José  
San Luis Obispo  
San Marcos  
Sonoma  
Stanislaus

At the time that Coded Memo AA-2007-04 was issued, the CSU had little experience in the implementation of such a broad and ambitious accessibility initiative. The timelines and milestones were established based upon awareness of relevant legal requirements, yet were influenced by limited experiences with the many specific programs required for actual system-wide implementation. Coded Memorandum AA-2006-41, which set forth the general roadmap for the ATI, had envisioned three phases: Planning and Evaluation (2006-07), Implementation (2007-08), and Assessment (2008-09). Assessment results were to be used to adjust and enhance strategies. After two years of herculean efforts on CSU campuses to plan and evaluate ATI needs and actions, and to begin implementation of those plans and actions, it is evident that the original timelines and milestones were overly ambitious, and that successful and effective implementation of the ATI will require more time than originally envisioned.

The ATI Department at the Chancellor's Office has determined that the requirements and timelines expressed in Coded Memo AA-2007-04 need to be revised to reflect these factors and that the general approach of system-wide deadlines needs to be modified to allow for the multiple strategies developed and implemented by campuses. They are engaged in a deliberative process, together with the ATI Leadership Council, to examine the nature of some of the milestones, as well as the most appropriate approach for their completion. This will require consultation with several different CSU stakeholder groups that are affected by the ATI.

### **Modifications to ATI Timelines**

As an interim measure, milestones in Coded Memo AA-2007-04 (and in subsequent Coded Memoranda that modified the milestone deadlines) are extended to June 1, 2010. Before the completion of this extension, the ATI Leadership Council will recommend and implement a revised approach and policy for ATI implementation. Of particular importance are three requirements:

- All administrative sites that are critical to institutional access (as established in the Web Accessibility Implementation Plan) should, at a minimum, conform to baseline accessibility standards as defined in Section 508. The May 15, 2009 deadline is extended to June 1, 2010.
- Implementation of an accessible procurement process for all E&IT procurement card acquisitions greater than \$2,500. The September 1, 2009 deadline is extended to June 1, 2010.
- New courses and new course content, including instructional materials and instructional websites, will be designed and authored in a manner that incorporates accessibility. The Fall Term, 2008 deadline is extended to June 1, 2010

All other ATI requirements that went into effect before September 1, 2009 will remain in effect.

Taking this interim step has been reviewed and approved by CSU legal counsel, the ATI Leadership Council and the Executive Sponsors Steering Committee.

### **Continuation of Implementation of ATI**

The extension of the deadlines listed above is a temporary measure to allow for the revisions to Coded Memo AA-2007-04 requirements and timelines that will be completed in the coming months. The over-arching goals of the Accessible Technology Initiative will remain in place, and campuses are encouraged to maintain the current efforts to achieve ATI goals as soon as possible. The CSU campuses have already taken significant and measurable steps to implement the ATI, including the establishment of ATI Coordinating Councils, the assignment of ATI responsibilities to staff members, the adoption of new processes and procedures and many more accomplishments that are important. Some campuses have exceeded the goals and timelines that have been put into place. These efforts must continue so that campuses will not experience major problems when the revised Coded Memo is issued. The Accessible Technology Initiative staff at the Chancellor's Office will continue to support campus efforts through the provision of professional development and training resources, the development and procurement of useful tools, coordination of communications between campuses and identification of best practices.

It is expected that campuses will use this period to continue their efforts to address ATI requirements. In addition, central and campus staff will be reviewing a variety of concerns and opportunities for improvement in the ATI. For example, in procurement, it has been difficult to develop processes to incorporate Section 508 into non-bid purchases. Meeting the milestones for making instructional materials accessible has been especially challenging. In particular, communicating with faculty and providing them with appropriate training and tools has been more complex, taken longer and required significantly more resources than was anticipated. Applying the requirements of the ATI to new, emerging technologies has also proven to be problematic. These areas, as well as others, will be carefully addressed in future recommendations.

The ATI Department in the Chancellor's Office has drafted a template for campus reports, which is intended to be used for several years and will allow the ATI Department to collect cumulative data regarding ATI implementation. This template will be published in October 2009, to be used by campuses initially for self-assessment and as a guide for recommended practices. While no reports will be required for AY 2009-2010, the completion of voluntary reports will be encouraged. Any voluntary annual reports will be used to develop refinements to the report templates based on AY 2009-2010 experiences. A revised reporting template will be provided in Spring of 2010.

Please contact Deborah Kaplan, Director of the Accessible Technology Initiative, at (562) 951-4251 or [dkaplan@calstate.edu](mailto:dkaplan@calstate.edu) if you have questions.