



SAN DIEGO STATE UNIVERSITY

ACCESSIBLE ELECTRONIC And INFORMATION TECHNOLOGY (AE&IT) PROCUREMENT PLAN

Draft 7/20/2007
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INTRODUCTION

The technical standards of Section 508 provide criteria specific to Electronic & Information Technology (E&IT) acquisition. E&IT includes information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information. The term E&IT includes, but is not limited to, computers, software, telecommunications products (such as telephones), information kiosks and transaction machines, World Wide Web sites, multimedia, and office equipment such as copiers and fax machines. The term does not include any equipment that contains embedded information technology that is used as an integral part of the product, but the principal function of which is not the acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. For example, HVAC (heating, ventilation, and air conditioning) equipment such as thermostats or temperature control devices, and medical equipment where information technology is integral to its operation, but are not considered to be E&IT products that fall under Section 508 requirements.

California Government Code Section 11135 and CSU Executive Order 926 requires the CSU to purchase E&IT products and services that conform to the requirements of Section 508 of the Rehabilitation Act of 1973, as amended.

1. DEFINITIONS – Roles and Responsibilities

Responsibilities associated with the following roles are listed below:

1.01 REQUESTOR- This is the individual who is requesting the acquisition of an E&IT product or service.

- a) Develops functional requirements for the requested products or services
- b) Conducts market research to identify sources that meet the functional requirements
- c) Determines which accessibility subcategories are applicable for the product
- d) Evaluates the supplier responses to Section 508 compliance
- e) Verifies Section 508 compliance information submitted
- f) Provides Section 508 documentation for the acquisition file
- g) Obtains The appropriate Section 508 Compliance Officer for each University Division review and approval (if necessary) of Section 508 compliance determination
- h) Provides the acquisition request along with the approved Section 508 documentation to the C&PM / Buyer
- i) Creates accurate and supportable functional requirements
- j) Conducts in depth, accurate and complete market research and evaluation of supplier Section 508 documentation
- k) Participates in formal competition acquisitions by providing necessary information to develop formal solicitation documents that include criteria to evaluate product conformance and evaluation of the proposals
- l) Informs Section 504 group on requirement for alternate access

1.02 The appropriate Section 508 Compliance Officer for each University Division:

- a) Assists campus staff, faculty, student, the public and other outside sources with Section 508 issues or questions
- b) Assists Requestor in the review of E&IT Section 508 compliance documentation
- c) Evaluates and in some instances approves exemption requests
- d) Creates comprehensive ATI Section 508 program
- e) Promotes the importance of Section 508 efforts
- f) Oversees Section 508 training
- g) Assists with the resolution of non-conformant procurements and contractor product problem and works to create win-win solutions
- h) Ensures consistent implementation of Section 508 programs
- i) Acts as liaison on Section 508 matters with management
- j) Works with Equal Employment Opportunities (EEO), Dept of Human Resources and Disability Services Office on issues, especially E&IT reasonable accommodation problems
- k) Works with relevant offices to address accessibility issues for students, employees and members of the public

Recommended traits of a 508 Compliance Officer:

- l) Recognized skill as a project manager or organizer or administrator
- m) Should not be a Technician, but must have access to them
- n) Has appropriate authority and management support
- o) Has good grasp of Section 508 law and understands Section 504 law
- p) Understands campus policy, procedures and constraints
- q) Have access to CIO resources and/or be involved in CIO planning and implementation meetings (to ensure Section 508 is considered in E&IT projects and procurements)
- r) Should have working relationship with the campus Equal Employment Opportunities (EEO), Dept of Human Resources and Disability Services Office, procurement office, legal attorney, and budget office

1.03 The Chief Information Officer (CIO):

- a) Facilitates coordination with the various divisional Section 508 compliance officers.
- b) Assists campus staff, faculty, student, the public and other outside sources with Section 508 issues or questions
- c) Evaluates and in some instances approves exemption requests
- d) Creates comprehensive ATI Section 508 program
- e) Promotes the importance of Section 508 efforts
- f) Oversees Section 508 training
- g) Assists with the resolution of non-conformant procurements and contractor product problem and works to create win-win solutions
- h) Ensures consistent implementation of Section 508 programs
- i) Works with Equal Employment Opportunities (EEO), Dept of Human Resources and Disability Services Office on issues, especially E&IT reasonable accommodation problems
- j) Works with relevant offices to address accessibility issues for students, employees and members of the public

1.04 Equal Employment Opportunities (EEO) Dept of Human Resources:

- a) Assists campus staff, faculty, student, the public and other outside sources with Section 508 issues or

questions

- b) Evaluates and in some instances approves exemption requests
- c) Promotes the importance of Section 508 efforts
- d) Assists with the resolution of non-conformant procurements and contractor product problem and works to create win-win solutions
- e) Ensures consistent implementation of Section 508 programs
- f) Works with CIO and Divisional Section 508 Compliance Officers on issues, especially E&IT reasonable accommodation problems
- g) Works with relevant offices to address accessibility issues for students, employees and members of the public

1.05 Disability Services Office:

- a) Assists campus staff, faculty, student, the public and other outside sources with Section 508 issues or questions
- b) Evaluates and in some instances approves exemption requests
- c) Promotes the importance of Section 508 efforts
- d) Assists with the resolution of non-conformant procurements and contractor product problem and works to create win-win solutions
- e) Ensures consistent implementation of Section 508 programs
- f) Works with CIO and Divisional Section 508 Compliance Officers on issues, especially E&IT reasonable accommodation problems
- g) Works with relevant offices to address accessibility issues for students, employees and members of the public

1.06 C&PM / Buyer: The Contract and Procurement Management (C&PM) unit / individual is responsible for the actual procurement of the E&IT product or service. With respect to the ATI Section 508 requirements, the C&PM / Buyer is responsible for reviewing the ATI documentation to verify the proper approval has been obtained and the proper documentation has been submitted to be included into the procurement file:

- a) Processes properly documented E&IT acquisition requests
- b) Considers only suppliers for the acquisition who have complied with Section 508 documentation requirements
- c) Purchases product per the market research and according to CSU policies and procedures
- d) Ensures that Section 508 requirements are contained in contracts awarded

1.07 TECHNICIAN: A Technician provides the interface between Section 508 requirements and technical specifications. The Technician may perform in a general capacity such as strategic planning of E&IT requirements or as a specialist such as in the evaluation of a particular E&IT product. Technicians in the various areas of E&IT specialty may be assigned on an as needed basis or on a permanent basis to assist with Section 508 issues. The Technician's roles and responsibilities may include:

- a) Assists the Requestor with functional requirements and market research
- b) Assists the Requestor with evaluating supplier Section 508 documentation
- c) Evaluates products with the appropriate Section 508 Compliance Officer for each University Division to determine the technical credibility of an exemption.
- d) Works with the C&PM/Buyer on technical questions and issues during the E&IT acquisition process
- e) Participates, as the Section 508 technical representative, in strategic planning of campus E&IT requirements (e.g., software development, training)
- f) Participates as the technical source in the resolution of accessibility issues of students, faculty, staff and the public
- g) Advises The appropriate Section 508 Compliance Officer for each University Division on technical matters

as they relate to accessibility issues.

Recommended traits of a Technician:

- h) Knowledgeable of the E&IT area and functions
- i) Experience in E&IT products (e.g., PCs, data center devices, printers)
- j) Experience in E&IT development (to help with contractor contracts)
- k) Experience with and interest in accessibility products
- l) Experience in assistive technology products and tools
- m) Knowledge of Section 508 technical standards and how to test for conformance
- n) Attention to details

2. MILESTONES and TIMELINES that conform to dates required by Coded Memo AA-2007-04)

2.01

TIMELINES that conform to dates required by Coded Memo AA-2007-04

Required Timeline	Due
Submission of E&IT Procurement Plan	8/10/07
Develop and Implement E&IT Procurement Procedure for acquisitions greater than \$50,000.	9/1/07
Develop and Implement E&IT Procurement Procedure for acquisitions greater than \$2,500. Procard purchases exempted	9/1/08
Develop and Implement E&IT Procurement Procedure for all acquisitions greater than \$2,500.	9/1/09
Develop and Implement E&IT Procurement Procedure for acquisitions less than or equal to \$2,500.	9/1/10

2.02

September 1, 2007 Milestone

Develop and Implement E&IT Procurement Procedure for acquisitions greater than \$50,000.

Task	Timeline	Responsible Party
Start working on forms, procedures, instructions and training	6/15/07	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Create train-the-trainer courses	9/15/07	The Section 508 Compliance Officer for each University Division

Conduct train-the-trainer courses	8/15/07	The Section 508 Compliance Officer for each University Division
Schedule training classes and notify individuals	8/20/07	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Submission of E&IT Procurement Plan	8/10/07	CO ATI Committee
Define Communication Process.	9/15/07	The Section 508 Compliance Officer for each University Division
Start training key people in the ATI procurement processes	8/30/07	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Create centralized special team that can help the Requestors and 508 Compliance Officers with Section 508 legal and process questions	9/15/07	The Section 508 Compliance Officer for each University Division
Implement E&IT Procurement Procedure for acquisitions greater than \$50,000	9/1/07	CS&P

2.03

September 1, 2008 Milestone

Develop and Implement E&IT Procurement Procedure for acquisitions greater than \$2,500, Procard purchases exempted:

Task	Timeline	Responsible Party
Start development of procurement policies	3/15/08	C&PM
Start development of procurement procedures	4/15/08	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Start working on forms, instructions, training, and communications	7/15/08	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Initiate communications with stakeholders	8/15/08	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Start training of key people	8/15/08	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Implement E&IT Procurement Procedure for acquisitions greater than \$2,500, Procard purchases exempted	9/1/08	C&PM

2.04

September 1, 2009 Milestone

Develop and Implement E&IT Procurement Procedure for all acquisitions greater than \$2,500.

Task	Timeline	Responsible Party
Start development of procurement policies	3/15/09	C&PM
Start development of procurement procedures	4/15/09	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Start working on forms, instructions, training, and communications	7/15/09	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Initiate communications with stakeholders	8/15/09	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Start training of key people	8/15/09	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Implement E&IT Procurement Procedure for acquisitions greater than \$2,500	9/1/09	C&PM

2.05

September 1, 2010 Milestone

Develop and Implement E&IT Procurement Procedure for acquisitions less than or equal to \$2,500.

Task	Timeline	Responsible Party
Start development of procurement policies	3/15/10	C&PM
Start development of procurement procedures	4/15/10	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Start working on forms, instructions, training, and communications	7/15/10	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Initiate communications with stakeholders	8/15/10	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Start training of key people	8/15/10	CIO, C&PM and the Section 508 Compliance Officer for each University Division
Implement E&IT Procurement Procedure for acquisitions less than or equal to \$2,500	9/1/10	C&PM

3. RESEARCH, EVALUATION, DOCUMENTATION, VERIFICATION

where appropriate and determination of exceptions related to E&IT

3.01 CORE FUNCTION OF ATI SECTION 508 PROCUREMENT:

- a) Create functional requirements for purchasing a product
- b) Conduct market research to determine the availability of a product to meet the functional requirements
- c) Evaluate products to determine the degree of compliance with Section 508 requirements and identifying the one that best meets these requirements
- d) Verify Section 508 actions and authorize exemptions, if any
- e) Require all suppliers to submit Section 508 compliance documentation (e.g., a completed VPAT or supplier checklist)
- f) Document Section 508 accessibility evaluations and conclusion

3.02 OUTLINE PROCUREMENT PROCESS:

The requirements of applicable laws and regulations for the acquisition of goods and services by the CSU are defined within the CSU Policy Manual for Contracting and Procurement. The implementation of these requirements and policies are defined by campus specific policies and procedures. These CSU policies and procedures will be updated to include the requirements for the acquisition of E&IT products.

- a) **FORMAL COMPETITIVE PROCUREMENTS - E&IT procurements subject to formal competition** requirements will require the Requestor to find sources for accessible technology with regard to the commercial availability of accessible products. This information will be used to develop formal solicitation documents, which will include requiring Supplier to submit Section 508 compliance documentation.

The Requestor and the appropriate Section 508 Compliance Officer for each University Division with assistance from the C&PM / Buyer will determine the information that firms will be required to submit to document the degree of compliance with Section 508 requirements and the criteria and its relative weighting that will be used to evaluate the documents submitted. Section 508 standards constitute an additional set of requirements to be evaluated and will be considered among all other procurement requirements in reaching an award decision. All other requirements are still relevant and evaluated as well. The CSU will purchase the commercial product that provides the greatest degree of compliance while satisfying other legal, policy and functional requirements.

Procurements below the formal competitive threshold – These E&IT procurements require the Requestor to perform market research with assistance, as needed, from the Technician and The appropriate Section 508 Compliance Officer for each University Division. Once conforming E&IT products have been identified or exemption has been approved by the appropriate 508 compliance officer for each University Division, the Requestor will submit the Section 508 documentation along with a Purchase Requisition to C&PM for processing in accordance with applicable procurement policies and procedures.

Based on the results of the market research conducted or the proposals evaluated, the C&PM / Buyer will procure the E&IT product as follows:

- b) All products that meet the functional requirements are 508 conformant (meets all the applicable standards): The C&PM / Buyer may purchase any of the products evaluated in accordance with applicable procurement policies and procedures.
- c) The products evaluated meets Section 508 requirements to varying degrees: The C&PM / Buyer must purchase the E&IT product in accordance with the applicable policies contained in the CSU Policy Manual for Contracting &

Procurement and campus procurement policies and procedures.

d) Product previously purchased and is still conformant: The E&IT product was previously determined to be conformant and there is no reason to believe that the status has changed. The C&PM / Buyer may purchase the product in accordance with applicable procurement policies and procedures. *(COMMENT: How will we track compliant procurments? Is SDSU going to host a site to list approved procurements <http://access.sdsu.edu/faqs.htm>. This conflicts with process paragraph where procurement should not be automatically extended to future procurments page 14)*

e) Approved Exemption: The E&IT product falls within one of the exemptions that have been approved. The C&PM / Buyer may purchase the product in accordance with applicable procurement policies and procedures.

3.03 EXEMPTIONS:

a) **NET COST INCREASE** - The CSU has a specific exemption base in California's Government Code Section 11135(c)(2). This Government Code section states:

"... In clarifying that the California State University is subject to paragraph (2) of subdivision (d), it is not the intention of the Legislature to increase the cost of developing or procuring electronic and information technology. The California State University shall, however, in determining the cost of developing or procuring electronic or information technology, consider whether technology that meets the standards applicable pursuant to paragraph (2) of subdivision (d) will reduce the long-term cost incurred by the California State University in providing access or accommodations to future users of this technology who are persons with disabilities, as required by existing law, including this section, Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12101 and following), and Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. Sec. 794). "

(COMMENT: Who's responsible? May be the division compliance officer, to be determined in SDSU Procedures?)

This section of the Gov. Code exempts the CSU from Section 508 requirements if it can be determined that in the procurement of accessible E&IT product will increase the cost to the CSU. Procurement policies and procedures incorporating Section 508 requirements, including Gov. Code Section 11135 (c) (2) exemption, are in the process of development and are not yet finalized.

1. Research – Conduct cost analysis to determine the net cost to the organization in procuring a product that conforms to Section 508 standards.
2. Evaluation – Evaluation of the cost analysis must include the long-term reduction in cost incurred by the CSU in providing access or accommodations to future users of this technology who are persons with disabilities.
3. Documentation – Cost analysis and supporting documentation
4. Verification – Cost analysis should also be reviewed by other appropriate departments with insight to the cost elements contained within the cost analysis – *such as the campus disability services office.*
5. Determination - Requestor, CIO, Technician, C&PM / Buyer, appropriate 508 Compliance Officer for each University Division, determine that the proof of an increase of expense to the CSU is justifiable and supportable

b) **COMMERCIAL NON-AVAILABILITY** - When acquiring E&IT products or services campuses are only required to comply with those standards that can be met with E&IT products that are available in the commercial marketplace in time to meet delivery requirements. Campuses need not acquire a noncommercial item in these cases solely to satisfy 508 standards. Commercial non-availability must be addressed on an individual standard basis, and campuses cannot claim a commercial product as a whole is non-available just because it does not meet all the applicable standards. In such cases campuses shall follow applicable procurement policies and procedures to purchase the product that best meets 508 standards or best value criteria.

1. Research - Conduct market research and product evaluation
2. Evaluation – Review the viability of using alternative accessible products.
3. Documentation - Maintain documentation of products evaluated

4. Verification – Requestor should review market research with Technician
5. Determination Requestor and 508 Compliance Officer review documentation

c) **SOLE BRAND** – A sole brand is when only one product meets the functional specification required. A sole brand product should first be reviewed and approved in accordance with campus policy and procedure for sole brand requests. An approved sole brand product is exempt from Section 508 requirements.

1. Research - Conduct market research and product evaluation
2. Evaluation – Review the viability of using alternative accessible products.
3. Documentation - Maintain documentation of products evaluated

d) **BACK OFFICE** - This pertains to a group of products that reside in either a telecommunication closet or data center. The products do not interact with people except when maintenance is required. An example is a server in a data center. If the server simply operates without human interaction, then the server qualifies as a back office exemption. If there is software running on the server that does have human interaction (e.g., Oracle), then the software is not exempt.

1. Research – Determine location and function of product.
2. Evaluation – Review possibility of interaction of product by CSU personnel
3. Documentation - Product functional requirements/specifications
4. Verification - Requestor only
5. Determination - Requestor and 508 Compliance Officer review documentation

e) **FUNDAMENTAL ALTERATION** - This exemption to Section 508 requirements is discussed in Process Section 4.

f) **UNDUE BURDEN** – This exemption to Section 508 requirements is discussed in Process Section 4.

g) **OTHER EXEMPTIONS** – In addition to the exemptions above, Section 508 provides for other types of exemptions that may be granted. Request for exemptions will be reviewed on a case-by-case basis and will be approved by the 508 Compliance Officer.

4. PROCESS DETERMINATION FOR UNDUE BURDEN AND FUNDAMENTAL ALTERATION

Sections 508 defines undue burden as a product that causes “significant difficulty or expense” to the organization.

4.01 PROCESS FOR DETERMINING UNDUE BURDEN

When determining if a product qualifies for an undue burden, the campus must consider the resources available to the program or component for which the product is being developed, procured, maintained, or used. Considerations should include the functionality needed from the product and the technical difficulty involved in making the product accessible. In addition, other considerations include compatibility with the campus or CSU infrastructure, including security, and the difficulty of integrating the product.

When an E&IT product or service qualifies as a potential undue burden, the requesting department, in coordination with campus purchasing office must submit a request along with the Purchase Requisition documentation to the CIO and Section 508 Compliance Officer for review and recommendation. The components of an Undue Burden request include:

- a) Description of the product and its function

- b) Description of the undue burden, specifically:
 - a. Applicable technical provisions of the Section 508 standards;
 - b. Specific provisions that cannot be met as a result of undue burden;
 - c. All funds available to the campus/CSU including the component for which the product or service is being acquired
- c) Estimated cost of acquiring a product that meets the applicable technical provisions along with an explanation of how costs were estimated
- d) Market research performed to locate items that meet the applicable technical provisions
- e) Proposed method of alternate access and its estimated cost.
- f) Time schedule on when it will no longer be an undue burden to the organization; i.e. product will be conformant
- g) Resubmission of undue burden request every two years until the product is conformant.

The CIO and the appropriate Section 508 Compliance Officer for each University Division will forward the undue burden request, along with their recommendation, to the campus President or designee. The President or designee will have the final authority to approve or disapprove the undue burden request.

A copy of the final determination of the undue burden request shall be retained by The appropriate Section 508 Compliance Officer for each University Division and also included in the procurement file. The The appropriate Section 508 Compliance Officer for each University Division shall make these records available upon request.

If an undue burden is approved, it is important to note that by statutory obligations the CSU must provide alternative access.

4.02 PROCESS FOR DETERMINING FUNDAMENTAL ALTERATION

The CSU is not required to make changes in the fundamental characteristics of a product to comply with Section 508 accessibility standards. This does not apply to cosmetic or aesthetic changes. One example of fundamental alteration is pocket-size pagers. Adding a larger display to a small pager may fundamentally alter the device by significantly changing its size to such an extent that it no longer meets the purpose for which it was intended. Adding accessibility features would not generally be considered a fundamental alteration, if it did not have any significant effect on the standard mode of operation or its size or weight. As a general rule, fundamental alteration had been applied to hand-held devices.

However, technology in this area is rapidly revolving and an exemption granted for one procurement should not be automatically extended to future procurements. Many hand-held devices that were once exempt due to non-accessibility features are now accessible. As a result, the Requestor and 508 Compliance Officer must be cognizant of the technology in this field to ensure that the exemption is valid. The determination of fundamental alterations includes the following steps:

- a) Research - Determine the functional requirements and the specific need for the E&IT product
- b) Evaluation – Review the accessibility of the product and the impact of the accessible product to the functional requirements
- c) Documentation - Supplier product documentation
- d) Verification - Requestor Only
- e) Determination - Technician and the appropriate 508 Compliance Officer for each University Division review documentation

5. PROCEDURES FOR PROVIDING EQUALLY EFFECTIVE ALTERNATIVE ACCESS FOR E&IT ACQUISITIONS

5.01

(COMMENT: Need input from committee and DSS)

The CIO and the appropriate Section 508 Compliance Officer for each University Division will develop a plan for alternate access methods for persons who require such access. The plan will include:

- a) A communications process with contact information for the articulation of access needs and accessibility issues from student, members of the public and employees with disabilities
- b) Protocol around 504/ADA accommodations including the process for providing access to EIT resources
- c) The responsibilities of the department (that has the inaccessible technology) in providing access to either the technology or to the information resources provided by that technology (i.e. web application)
- d) A process for filing a complaint regarding accessibility
- e) A feedback mechanism to evaluate the effectiveness of the solutions

When E&IT acquisitions are approved for exception or are not yet subject to the E&IT accessible procurement process the Requestor is responsible for notifying the Section 508 Compliance Officer that such a product was procured. Section 508 Compliance Officer and Requestor in consultation with appropriate offices will assess the potential impact on students, employees, and members of the public. For every exempted acquisition that is not for one person's use, the requestor needs to articulate the process for how access will be provided to individuals with disabilities.

6. COMMUNICATION PROCESS AND TRAINING PLAN TO EDUCATE CAMPUS COMMUNITY

6.01 COMMUNICATION PROCESS

Communications is the methodology to explain or educate the campus community on what Section 508 is, answer questions and address concerns. The CIO will facilitate the communication regarding Section 508 compliance.

General communications on Section 508 overall:

- a) Publish weekly newsletters with articles and events of interest that include Section 508 issues
- b) Distribute internet/intranet letters to the campus community explaining Section 508. There has been a recognized trend that people prefer to gather information and participate via the Internet rather than attend physical meetings.
- c) Establish a Section 508 web site that provides information and allows discussions of current issues Keep it light, interesting, and avoid as much as possible technical terms.
- d) Conduct at least two "town meetings" so that people can interact and ask questions. This format resolves many issues because people think they have been heard.
- e) Establish an e-mail address for questions and comments. Include important questions and comments in the weekly campus newsletter. The Contract and Procurement Management Office will upon request consider participating in the responses to applicable questions and comments.

Communications for specific implementation phases:

- f) Conduct seminars in the areas of most interest and confusion (e.g., PC labs, disability labs, EEO, advocacy groups).
- g) Publish information in the campus weekly intranet newsletter on the impending phase.
- h) Conduct general seminar or town meeting to explain the overall impact of the phase on the campus community.
- i) Send letter to the individuals impacted by each new implementation (i.e., 9/1/07, 9/01/08, etc.), explaining

the impending process and how it will impact on the individuals and their areas of responsibility. The letter will provide time and dates of training and encourage the individuals to attend due to the importance of the process on the way they do business.

j) Send email in advance of the training to remind individuals to attend scheduled trainings.

6.02 DISCUSSION FORUMS

Hold discussion forums throughout the planning and implementation process. Use this form of communication to provide stakeholders with a role in the creation and development the ATI process.

Some possible topics for discussion during the communication process:

- a) What are Sections 504 and 508?
- b) How does Section 504 affect me, the individual?
- c) How does Section 508 affect me, the individual? Of particular note is the issue of accessibility and the process.
- d) What is the schedule for implementing Section 508? Why so long?
- e) What can an individual with a disability do until the program has been completely implemented? From your perspective, what should CSU do to avoid lawsuits, adverse actions and negative media until the program is completely implemented?
- f) What are exemptions? Explain the rationale why that even after Section 508 is implemented, products might not be conformant. It will be difficult to explain exemptions to people with disabilities.
- g) Who will be affected by the Section 508? If I am one, how will I learn about my role in the process?

6.03 TRAINING PROCESS

Training is the methodology to explain to or educate all individuals involved with the Section 508 process. Some of the options for individuals to be trained are:

Overall:

- a) The appropriate Section 508 Compliance Officer for each University Divisions. Possible subjects to be covered:
 1. Comprehensive block on the 508 Compliance Officer's roles and responsibilities
 2. Available resources and support sources
 3. The secrets on how to be a 508 Compliance Officer and what to expect
 4. Better understanding of the law and exemptions
 5. Discussion on his/her concerns and issues and possible solutions for them
- b) C&PM / Buyer. (Contract and Procurement Management Office) Possible subjects to be covered:
 1. Comprehensive block on Section 508
 2. Better understanding of the law and how it impacts on procurement
 3. C&PM / Buyer's role and responsibilities
- c) Technicians (Relevant Departmental Offices) Possible subjects to be covered:
 1. 508 technical standards
 2. How to know whether a standard has been met
 3. Evaluating conformance
 4. Accessibility testing protocol
- d) Management that will be affected by 508. Possible subjects to be covered:
 1. Overview on Section 508
 2. Implementation schedule

3. Campus processes
4. The roles and responsibilities that management and offices will have in the process (e.g., selection of The appropriate Section 508 Compliance Officer for each University Divisions, technical assistance, public support of the program)

For Each Implementation:

- e) Requestors. Possible subjects to be covered:
 1. Comprehensive block on the Requestor's roles and responsibilities
 2. Available resources and support sources
 3. Discussion on his/her concerns and issues and possible solutions for them

- f) C&PM / Buyers, Requestors, The appropriate Section 508 Compliance Officer for each University Divisions and Technicians. Training may be conducted with all three groups together so that they will be better acquainted and understand their relationships. Possible subjects to be covered:
 1. Basic block on what is Section 508 (the law and overall campus process)
 2. How to process an E&IT acquisition request
 3. Forms, checklists and procedures
 4. Market research and evaluating the supplier checklists
 5. What is everyone's roles and responsibilities in the process

- g) CIO and Offices that will be affected by Section 508. Possible subjects to be covered:
 1. Overview on Section 508
 2. Implementation schedule
 3. The roles and responsibilities that management and offices will have in the process (e.g., selection of The appropriate Section 508 Compliance Officer for each University Divisions, technical assistance, public support of the program)
 4. The procurement process and its impact on the Offices

- h) Specialty groups Includes members of groups where applicable, such as including students, faculty, staff and contractors. Could include topics such as software development, training and web products.
 1. Overview on Section 508
 2. The Section 508 process tailor to specifically to the audience
 3. Roles and responsibilities
 4. Implementation schedule

Training should start two to three weeks before the implementation of the process. Each training class should be offered several times.

7. EVALUATION PROCESS TO MEASURE EFFECTIVENESS OF PLAN

7.01 GOAL

The goal for 100% of acquisition requests to comply with Section 508 requirements. This goal is met by enforcing the process outlined in the Research, Evaluation, Documentation Section 3.

There are four components of this goal:

- a) Market Research: Verified by a completed and attached supplier Section 508 documentation
- b) Supplier provided information and conformance of the product. Verified by the Requestor's signature on the

E&IT Procurement form (to be developed). For large scale purchases, verification will also come from the completed testing protocol signed by one charged with conducting conformance testing of the product.

- c) Documentation, Review and Exemptions: Verified by The appropriate Section 508 Compliance Officer for each University Division's initials on the E&IT Procurement form
- d) C&PM / Buyer purchased E&IT products as outlined by the Section 508 law: Verified through random sampling.

7.02 EVALUATION METHODOLOGY

Campus will self-check by randomly selecting and reviewing a sample of E&IT acquisitions twice a year on each campus (in the first couple of years, once a year after that) The review will verify that the proper Section 508 documentation have been completed and included in the procurement files.

This evaluation measures three criteria:

- a) Requestor has conducted market research and an evaluation of the E&IT product for Section 508 standards conformance
- b) C&PM / Buyer is only accepting E&IT acquisition request that have the proper Section 508 documentation
- c) C&PM / Buyer is purchasing E&IT products as outlined by the Section 508 law

7.03 MEASUREMENT OF EFFECTIVENESS

The percentage of file with the proper documentation. Goal is 100%.