

## **Campus ADA-Assistive Technology Initiative (DRAFT – 3/11/05)**

### **Compliance Driven Legislation and Mandates**

Accessibility to information technology resources – such as Web-based materials, programs and services – is mandated by federal and state law, including Section 508 of U.S. Rehabilitation Act of 1973 and Section 11135 of the California Government Code.

The CSU and its campuses (including Cal Poly) are required to comply with these laws, and it is the policy of the CSU to make information technology resources and services accessible to all CSU students, faculty, staff, and the general public regardless of disability.

CSU Executive Order 926 (<http://www.calstate.edu/EO/EO-926.html>) went into effect on January 1, 2005. The policy is a result of Recommendation #1 of the CSU Trustee Audit Disability Support and Accommodations Report Number 02-33 and is a compilation of statewide-related policies and procedures for disability support and accommodations. In addition, the executive order formalizes and documents responsibilities for the oversight of system-wide activities, including policy and procedural development and compliance and monitoring.

Cal Poly has committed existing resources to facilitate and support campus compliance. Information Technology Services, Robert E. Kennedy Library, Employment Equity and Faculty Recruitment, and the Disability Resource Center are coordinating efforts to identify and address individual needs to develop, implement and support resources for making campus information technologies more accessible.

### **Risk Management Issues**

Beyond awareness and the spirit of compliance driven legislation and mandates, noncompliance may incur costly legal penalties and tougher sanctions against the University based on recent experiences by other California colleges and universities.

It should be noted that “after the fact” and reactive sanctions have impacted campus productivity and required costly intervention to mitigate. Increasing regulatory and audit compliance pressures are also requiring more stringent standards to be implemented in academic, administrative and public access to information technology resources and services.

### **Solution Strategy: Migration and Mitigation**

Cal Poly needs to adopt a campus-wide approach including ASI, Foundation, State and Auxiliaries to address ADA-assistive technology compliance issues. Active involvement of faculty, staff, students and administrators is essential. A phased implementation methodology should be adopted. The following should inform and guide this process

- Federal and State Legislation
- CSU Chancellor's Office Executive Order 926
- CSU ADA-assistive technology initiatives
- Teaching, learning and industry “best practices”
- Available CSU and Cal Poly Resources and Services

### **Goals**

1. Perform an initial series of focused assessments of existing “highly trafficked” sites and accessible resources based on available screening tools. Prioritize areas for remediation and initiate migration and mitigation activities as outlined in Executive Order 926 via the campus “Disability Access and Compliance” standing committee.  
Target date: June 1, 2005
2. Inventory existing “ADA-assistive technology” information technology resources and services accessible to all CSU students, faculty, staff, and the general public regardless of disability. Present broader and longer term priorities and recommend migration and mitigation strategies based on known and potential risks and currently available resources.  
Target date: May 1, 2005

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3. Ensure campus compliance with federal and state legislation, including CSU Executive Order 926, and provide programmatic and resource recommendations to IRMPPC and the President in support of long-term, strategic planning processes, known services demands, and to staff and support necessary oversight and continuing direction for the campus in fulfillment of the requirements of the Executive Order and its supplemental directives .  
Target date: On-going

### **Near-Term Objectives (February - August 2005)**

1. Inventory, review and consolidate existing ADA-assistive technology policies and procedures into a streamlined framework using the policy, standard, guideline and procedure documentation approach:
  - POLICY - A policy is a guiding or governing principle that mandates or constrains action.
  - STANDARD - A standard is a level of quality that requires conformity.
  - GUIDELINE - A guideline is recommended but optional behavior.
  - PROCEDURE - A procedure is a series of interrelated steps that are taken to help implement a policy, standard or guideline. Instructions and forms facilitate completing the procedures.
2. Establish the campus “Disability Access and Compliance” standing committee per CSU Executive Order 926 (includes faculty, staff, students; ASI, Foundation, auxiliaries, State).
3. Prioritize areas for immediate and long-term remediation, migration and mitigation activities as outlined in Executive Order 926 via the campus “Disability Access and Compliance” committee.
4. Implement an awareness campaign that will “inform and advise” the campus community of CSU and Cal Poly obligations to comply with compliance driven legislation and mandates and to encourage effective use of available resources and support services.
5. Communicate to the campus community a specific set of prioritized migration and mitigation activities and plans. Specific areas of near-term focus will include:
  - Infrastructure to enable Disability Resource Center support services
  - Ordering and procurement processes (e.g. textbooks, software, multi-function devices/hardware)
  - CSU Center for Alternative Media (CAM) services to expedite delivery of electronic texts (e-texts of instructional materials) to eligible CSU students with disabilities
  - Streamline campus processes to facilitate acquisition of electronic texts where feasible

*Note: With the exception of mathematics and science textbooks, state law (AB422) now requires publishers or manufacturers of printed instructional materials for students attending CSU to provide the same materials in an electronic format (at no charge to the University) to promote accessibility by students with disabilities.*

6. Implement common standards along with common toolsets and training in support of a phased campus campaign to migrate and mitigate existing Cal Poly Web pages and online instructional course materials and resources and ensure that newly created Web pages and materials comply.

*Note: an approach similar to the University of Wisconsin is highly recommended (below).*

All new Web pages and the top 20% of existing Web pages most frequently used (e.g. that get the largest number of hits) should be placed in the first priority. Pages required for participation, funding, disability-related services and other key pages needed by people with disabilities, not already in the top 20%, should also be placed in the first priority.

Each department or University entity is responsible for determining the top 20% of Web pages used and other high priority Web pages (e.g. official university Web pages).

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Each University Web site must contain an accessible link or a person to contact if users have trouble accessing content within the site. This would usually be the Web page developer.

Web pages and electronic materials specifically requested to be made accessible as part of a formal accommodation request shall be made accessible as soon as possible, or an equally effective alternative shall be provided. Equally effective means that it communicates the same information in as timely a fashion as does the Web page. Undue administrative or financial burdens may contribute to a determination that alternative formats be used to provide the information to individuals requiring use of the information.

7. Select, develop and implement standardized “ADA-assistive technology” assessment and development tools, templates, support and reporting procedures throughout campus that address IT related access priorities (e.g., monitoring and tracking metrics on progress toward meeting compliance driven legislation and mandates; call routing in a hybrid IT support model of centralized-decentralized teams; trends on training and procurements).
8. Work with affected students to facilitate their immediate needs and requirements, which will be incorporated into a proactive notification, ordering and distribution process (e.g. affected students self-identify through an opt-in Cal Poly portal channel the need for access tools or ADA-assistive technologies; in turn, campus entities will work with faculty to facilitate access to tools, timely ordering of books, and other instructional/Library-centric materials).