



SACRAMENTO
STATE

CALIFORNIA STATE UNIVERSITY, SACRAMENTO

**Accessible Electronic and Information Technology
Procurement Plan**

8/8/2007

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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 include information technology integral to their 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.

Definitions

Electronic and Information Technology (E&IT) – Any electronic equipment or interconnected system or subsystem of equipment, or software, that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, and/or switching.

Requestor – Person, department, or grant requesting the purchase of E&IT goods and/or services.

Section 508 – Part of the Rehabilitation Act of 1973 as amended in 1998; requires that electronic and information technology developed, procured, maintained or used by the federal government to be accessible to people with disabilities.

California Government Code 11135 – State law that requires the CSU to implement Section 508 and to apply the federal accessibility standards to the electronic and information technology (E&IT) products and services that CSU buys, creates, uses, and maintains.

E&IT Procurement Checklist – The vehicle by which all computing, media, and telecommunications-related purchases and services are reviewed and approval is indicated. The EIT Procurement Checklist is attached to the Requisition for all E&IT procurement actions valued over \$50,000.00 (Appendix A).

Section 508 Compliance Officer – The CIO or designee responsible for the administration and management of the Section 508 Program.

Technician – A staff member who provides the interface between Section 508 requirements and technical specifications. Technicians may perform as a specialist such as evaluation of a particular E&

IT product. Technicians may be assigned on an as needed basis or a permanent basis to assist with Section 508 issues.

Buyer - The Procurement and Contract Services staff member responsible for E&IT product or service acquisition. The Buyer is responsible for reviewing the E&IT Procurement Checklist (see Appendix A) document for completeness and verification that the requested products meet Section 508 requirements.

Formal Competitive Bid Threshold – All goods and services with estimated costs in excess of \$50,000.00.

Voluntary Product Accessibility Template (VPAT) – Template developed by the federal government so that vendors could disclose the extent that their E&IT products and services conform to each of the Section 508 technical standards. A number of E&IT companies routinely produce VPATs and post them to their company web sites. VPATs are specific to makes and models.

Component 1: Research, evaluation, documentation, verification where appropriate, and determination of exceptions related to E&IT.

Core functions of ATI Section 508 Procurement

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

Outline of 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.

Formal Competitive Procurements - E&IT procurements subject to formal competition requirements will require the Requestor (i.e. person originating the purchase requisition) to conduct market research with regard to the commercial availability of accessible products. This information will be used to develop formal solicitation documents, which will include requiring the Vendor to submit Section 508 compliance documentation.

The Requestor and Section 508 Compliance Officer with assistance from the Buyer (i.e. authorized Procurement Services staff member) will determine the information that firms will be required to

submit to document the degree of compliance with Section 508 requirements, as well as the criteria and relative weighting of those criteria used to evaluate the documents submitted. Section 508 standards constitute an additional set of requirements beyond those previously used and will be considered among all other procurement requirements in reaching an award decision. Existing requirements are still relevant and continue to be evaluated as before. The CSU will purchase the commercial product that provides the greatest degree of compliance with Section 508, while satisfying other legal, policy and functional requirements.

Procurements below the formal competitive threshold – These E&IT procurements not requiring formal competitive bids still require the Requestor to perform market research regarding accessibility, with assistance, as needed, provided by the Buyer and Section 508 Compliance Officer. Once conforming E&IT products have been identified (or exemption approved), the Requestor will submit the Section 508 documentation along with a Purchase Requisition Form to the Buyer to complete the purchase in accordance with applicable procurement policies and procedures.

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

- **All products that both meet the functional requirements and are 508 conformant (meets all the applicable standards):** The Buyer may purchase any of the products evaluated in accordance with applicable procurement policies and procedures.
- **The products evaluated meet Section 508 requirements to varying degrees:** The Buyer must purchase the E&IT product in accordance with California State Government Code 11135 and CSU Executive Order 926. Products which do not meet fully meet 508 requirements shall be considered based on the degree of acceptability (weighted factor). The Buyer will also consider best value methodology using relative weighted factors specified in the Request For Proposal (RFP) document. The final award shall be consistent with applicable campus procurement policies and the CSU Policy Manual for Contracting & Procurement.
- **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 Buyer may purchase the product in accordance with applicable procurement policies and procedures.
- **Approved Exemption:** The E&IT product falls within one of the exemptions that have been pre-approved or the Requestor has approval through the formal campus process for approving exemptions. The Buyer may purchase the product in accordance with applicable procurement policies and procedures.

Possible Exemptions

Net Cost Increase - The CSU has a specific exemption basis found 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). "

This section of the Gov. Code exempts the CSU from Section 508 requirements if it can be determined that the procurement of accessible E&IT product will increase the life-cycle cost to the CSU (i.e. the cost considering all applicable future costs). Procurement policies and procedures incorporating Section 508 requirements, including specific procedures for Gov. Code Section 11135 (c) (2) exemption, are in the process of development and are not yet finalized. The following general process should be used to request an exemption:

- Research – Conduct cost analysis to determine the long-term net cost to the organization in procuring a product that conforms to Section 508 standards.
- 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.
- Documentation – Provide written cost analysis and supporting documentation
- Verification – Cost analysis should also be reviewed by other appropriate departments with insight into the cost elements contained within the cost analysis – such as the Office of Services to Students with Disabilities and the Information Resources and Technology division.
- Determination – The Exception Review Committee (i.e. Buyer, 508 Compliance Officer, Director of Equal Opportunity, and CIO) will approve all exceptions after evaluating documents and determining that proof of an increase of expense to the CSU is justifiable and supportable.

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 will be addressed on an individual standard basis, and campuses cannot claim a commercial product as a whole as 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 considering varying degree (weighted factor) or best value criteria. The process for applying for an exemption due to commercial non-availability is:

- Research - Conduct market research and product evaluation
- Evaluation – Review the viability of using alternative accessible products.
- Documentation – Compile and provide documentation of products evaluated
- Verification – Requestor submits market research and documentation to the Exception Review Committee.
- Determination - Requestor and 508 Compliance Officer review documentation

Sole Brand/Sole Source – “Sole brand” and “sole source” are two procurement methods that inherently limit competition. Approval of a sole brand/sole source for E&IT is when only one product meets the functional specification required. A sole brand/sole source product should first be reviewed and approved in accordance with campus policy and procedure for sole brand/sole source requests. An approved sole brand/sole source product is exempt from Section 508 requirements.

- Research - Conduct market research and product evaluation
- Evaluation – Review the viability of using alternative accessible products.
- Documentation – Submit documentation of products evaluated and explanation of need for sole source/sole brand to Procurement.

Back Office - This pertains to a group of products that reside in either a telecommunication closet, data center, or other area not used by the campus at large. People typically do not interact with products except when maintenance is required. An example is a server in a data center or a switch in a data closet. If the server or switch simply operates without human interaction, then the server probably qualifies for a back office exemption. However, if there is software running on the server that does have interaction with the public (e.g., Oracle) then the software is not exempt.

- Research – Determine location and function of product.
- Evaluation – Review possibility of interaction of product with CSU clients
- Documentation – Collect data in support of back-office only use
- Verification - Requestor submits documentation to 508 Compliance Officer
- Determination - 508 Compliance Officer reviews and approves

Fundamental Alteration - This exemption to Section 508 requirements is discussed in Component 2 below.

Undue Burden – This exemption to Section 508 requirements is discussed in Component 2 below.

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 Exception Review Committee, 508 Compliance Officer or CIO as appropriate.

Component 2: Process for determining Undue Burden and Fundamental Alteration

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

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.

The components of an Undue Burden request shall be described and submitted to the 508 Compliance Officer and shall include:

- Description of the product and its function

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

If it is determined that an E&IT product or service may qualify as a potential undue burden, the Section 508 Compliance Officer will submit a request to the CIO that includes the E&IT Procurement Checklist (see Appendix A) and all other relevant documentation. The E&IT Exception Review Committee will then review any E&IT acquisition requests and approve as appropriate. The Committee may also seek technical assistance from the office of the Services to Students with Disabilities and from the Information Resources and Technology division. The CIO will then forward the Undue Burden Request, along with the Committee's recommendation, to the President. The President or his/her designee has 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 CIO and the Section 508 Compliance Officer, and will also be included in the Procurement & Contracts Services file. The Section 508 Compliance Officer 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 still provide alternative access.

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. 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. However, this type of exception does not apply to cosmetic or aesthetic changes. Adding accessibility features in software or through small peripherals would not generally be considered a fundamental alteration, as doing so would not have any significant effect on the standard mode of operation or the devices size or weight.

Keep in mind that technology in this area is rapidly revolving and an exemption granted for one procurement should not be automatically extended to future procurements. Many types of technology 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 range of technology in a given field to

ensure that the exemption is valid. The determination of fundamental alteration as a 508 exception includes the following steps:

- Research - Determine the functional requirements and the specific need for the E&IT product
- Evaluation – Review the accessibility of the products available and the impact of the accessible product to the functional requirements
- Documentation – Provide vendor product documentation showing need for fundamental alteration
- Verification - Requestor reviews for compliance and submits written rationale to Exception Review Committee
- Determination - Exception Review Committee reviews documentation and approves

Component 3: Procedures for providing equally effective alternative access for E&IT acquisitions that are approved for exceptions or that are not yet subject to the E&IT accessibility procurement process.

The Director of Equal Opportunity/ADA Compliance or designee, the Co-Director for Services to Students with Disabilities or designee will work with the Requestor, Section 508 Compliance Officer and Technician to develop a plan for alternate access methods for persons who require such access. The plan will include:

- 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
- Protocol around 504/ADA accommodations, including the process for providing access to E&IT resources
- 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)
- A process for filing a complaint regarding accessibility
- 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. The Section 508 Compliance Officer and Requestor in consultation with appropriate offices will assess the potential impact on students, employees, and members of the public and plan for alternate access methods for persons who require such access.

Component 4: A communication process and training plan to educate the campus community about Section 508 procurement requirements and the established procedures

Communication Process

A variety of methods may be used to communicate information regarding E&IT procurement policies and procedures to the campus community. The communications may be designed to target a specific group or may be campus-wide. As an example, the communication of the policies and procedures for E&IT procurements over \$50,000 will target a relatively small number of end-users, as there are

specific and limited departments or auxiliary and enterprise organizations that will make a purchase of this size on behalf of the University and/or their organization.

For general information to the campus community regarding Section 508 procurement procedures, the following communications methods may be used:

- Information posted on the ATI and the Procurement and Contract Services websites
- Information article(s) published in the Sac State Bulletin and the Hornet newspaper
- Presentation(s) at the Business Partners Roundtable meetings, Cabinet, Administrative Council, and other campus affinity groups
- Email memo(s) to the campus community

For communications at specific implementation phases, additional communications may be used in addition to the methods listed above, including:

- Email(s) sent to individuals affected by each new implementation prior to implementation date, explaining the impending process and how it will impact their areas of responsibility.
- Workshop(s) offered for those individuals with procurement responsibilities for a department.
- On-line training for Requestors.

For communication to key departments and individuals that have roles and responsibilities in regard to Section 508 compliance, informational meeting(s) may be held to provide inform those on campus about ATI, Section 508, procurement procedures, and other related topics. Key departments providing training and communication include Information Resources and Technology, Procurement Services, Services to Students with Disabilities, and others. Staff in these departments may have valuable input in developing or streamlining processes and communications, and their knowledge of the policies and procedures associated with the ATI will assist the campus to comply with Section 508 requirements.

In developing the processes for procurement of products and services below \$50,000 and through use of the Procurement Card, focus group(s) will be held to get input from end users (Requesters). This will assist in communicating the importance and necessity of the changes to the process as well as give the Requestors an opportunity to have input and buy-in to the process.

Some possible topics for discussion at the focus groups and meetings with key departments include:

- What are Sections 504 and 508?
- How does Section 504 affect me, the individual?
- How does Section 508 affect me, the individual? Of particular note is the issue of accessibility and the process.
- What is the schedule for implementing Section 508? Why so long?
- 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?
- 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.

- Who will be affected by the Section 508? If I am one, how will I learn about my role in the process?

Specific communications targeted at end-users will be provided prior to the implementation dates. General communications will be on-going, and will be issued strategically to capture the largest potential audience.

Training Process

Training is the methodology to explain to or educate all individuals involved with the Section 508 process. Trainings may be offered as workshops (offered at multiple times), on-line training through LearnerWeb or other learning management system or as single workshops with targeted groups. The following information will be provided to those individuals that have specific roles in the implementation of the Section 508 procurement requirements:

- Section 508 Compliance Officer - possible subjects to be covered:
 - 508 Compliance Officer's roles and responsibilities
 - Available resources and support sources
 - Better understanding of the law and exemptions
 - Discussion on his/her concerns and issues and possible solutions for them
- Buyer - possible subjects to be covered:
 - Comprehensive information on Section 508
 - Understanding of the law and its impact on procurement
 - Buyer's role and responsibilities
- Technicians - possible subjects to be covered:
 - 508 technical standards
 - How to know whether a standard has been met
 - Evaluating conformance
 - Accessibility testing protocol
- Information Resources & Technology and other offices that have specific roles in the implementation of Section 508 - possible subjects to be covered:
 - Overview on Section 508
 - Implementation schedule
 - The roles and responsibilities that individuals and offices will have in the process (e.g., Section 508 Compliance Officer, Requestors, Technicians, etc.)
 - The procurement process and its impact on departments
- Management (Cabinet, Administrative Council). Possible subjects to be covered:
 - Overview on Section 508
 - Implementation schedule
 - Campus processes
 - The roles and responsibilities that departments have in the process (e.g., department staff that have responsibility to attend trainings, technical assistance, etc.)

For Each Implementation:

- Requestors - possible subjects to be covered:
 - Requestor's roles and responsibilities
 - Available resources and support sources
 - Discussion on his/her concerns and issues and possible solutions for them

- Buyers, Requestors, Section 508 Compliance Officer and Technicians. - training may be conducted with all three groups together so that they understand their responsibilities and interactions. Possible subjects to be covered:
 - Basic block on what is Section 508 (the law and overall campus process)
 - How to process an E&IT acquisition request
 - Forms, checklists and procedures
 - Market research and evaluating the vendor checklists
 - What is everyone's roles and responsibilities in the process

- Departments that have specific roles in the implementation of Section 508. Possible subjects to be covered:
 - Overview on Section 508
 - Implementation schedule
 - The roles and responsibilities that individuals and offices will have in the process (e.g., Section 508 Compliance Officer, Requestors, Technicians, etc.
 - The procurement process and its impact on departments

Component 5: An evaluation process to measure the effectiveness of the plan

The overall goal is for 100% of acquisition requests to comply with Section 508 requirements. A baseline will first be established so that progress toward this goal can be incrementally measured. There are four components of this goal related to Component 1 above:

- **Market Research:** Requestors will conduct appropriate research and attach complete vendor Section 508 documentation for all applicable purchases.
- **Vendor provided information and conformance of the product:** All applicable requestor's will submit the signed E&IT Procurement Checklist (to be developed). For large scale purchases, verification will also come from the completed testing protocol, verified by the 508 Compliance Officer.
- **Documentation, Review and Exemptions:** All applicable purchases will be verified by the Section 508 Compliance Officer's initials on the E&IT Procurement Checklist (see Appendix A).
- **Buyer purchased E&IT products as outlined by the Section 508 law:** Records will be kept by Procurement on the status of 508 compliance or exception, verified through random sampling.

Evaluation Methodology

Campus will self-check by randomly selecting and reviewing a sample of E&IT acquisitions twice a year for the first two years of implementation of each phase; frequency may then be reduced to once a year. The review will verify that the proper Section 508 documentation has been completed and included in the procurement files.

This evaluation measures three criteria:

- Requestor has conducted market research and an evaluation of the E&IT product for Section 508 standards conformance
- Buyer is only accepting E&IT acquisition requests that have the proper Section 508 documentation
- Buyer is purchasing E&IT products as outlined by the Section 508 law
- Any exceptions have been processed appropriately

Measurement of effectiveness: The percentage of files with the proper documentation. Goal is 100%.

Component 6: The identification of roles and responsibilities associated with the above process

Responsibilities associated with the following roles are listed below:

Requestor - A staff, faculty or administrator employed by the University. The individual who initiates the acquisition of an E&IT product or service requirement. The Requestor has the following responsibilities:

- Submits the E&IT Procurement Checklist (see Appendix A) and completes the following as required:
 - Identifies functional requirements for the requested products or services that are accurate and supportable
 - Conducts market research to identify sources that meet the functional requirements. Research should be in depth and accurate, and include complete market research and evaluation of vendor Section 508 documentation.
 - Identifies which accessibility subcategories are applicable for the product
 - Evaluates the vendor responses to Section 508 compliance
 - Verifies Section 508 compliance information is complete before submission, and that appropriate background documentation is included as needed.
 - Ensures that appropriate approvals are received before acquisition
- Submits or oversees submission of the request in the CMS Financial system.
- Participates in formal competition acquisitions as necessary by providing necessary information to develop formal solicitation documents that include criteria to evaluate product conformance and evaluation of the proposals
- Informs Section 504 group on requirement for alternate access as needed.

Section 508 Compliance Officer - the CIO or manager designated by the CIO to oversee campus compliance with Section 508 requirements. The Section 508 Compliance Officer has the following responsibilities:

- Assists campus staff, faculty, student, the public and other outside sources with Section 508 issues or questions
- Assists Requestor in the review of E&IT Section 508 compliance documentation
- Evaluates exemption requests; may have authority to approve requests as designated by the CIO.
- Promotes the importance of Section 508 efforts and works to ensure consistent implementation of Section 508 programs
- Contributes to the development of Section 508 training
- Assists with the resolution of non-conformant procurements and contractor product problem and works to create win-win solutions
- Works with the Director of Equal Opportunity/ADA Compliance and the Co-Director for Services to Students with Disabilities to resolve issues related to reasonable accommodation.
- Works with relevant offices to address accessibility issues for students, employees and members of the public.

Desired traits of a 508 Compliance Officer:

- Recognized skill as a project manager or organizer or administrator
- Should not be a Technician, but must have access to them
- Has appropriate authority and management support
- Has good grasp of Section 508 law and understands Section 504 law
- Understands campus policy, procedures and constraints
- Has 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)

Buyer - the buyer in Procurement and Contract Services who is responsible for the actual procurement of the E&IT product or service. The Buyer is responsible for reviewing the E&IT Procurement Checklist (see Appendix A) documentation for completeness and verification that the requested product or service meets the Section 508 requirements, and that the proper documentation has been submitted to be included into the procurement file. The Buyer has the following responsibilities:

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

Technician – the Technician provides the interface between Section 508 requirements and technical specifications. The Technician may perform 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 has the following responsibilities:

- Assists the Requestor with functional requirements and market research
- Assists the Requestor with evaluating vendor Section 508 documentation
- Evaluates products with the E&IT Procurement Request Team to determine the technical credibility of an exemption.
- Works with the Buyer on technical questions and issues during the E&IT acquisition process
- Provides input to the development of Section 508 training
- Participates as a technical source in the resolution of accessibility issues of students, faculty, staff and the public

Desired traits of a Technician:

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

The E&IT Exception Review Committee – The CIO, the Section 508 Compliance Officer, the Co-Director for Services to Students with Disabilities, the Director of Equal Opportunity, and a Technician appointed as needed will work as a team to review E&IT acquisition requests that may qualify for exemption or as a potential undue burden, or have other issues that require expertise from multiple sources.

Component 7: Milestones and 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

September 1, 2007 Milestone

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

Task	Timeline	Responsible Party
Identify Section 508 Compliance Officer and Technician(s)	8/10/07	CIO
Submission of E&IT Procurement Plan to C.O.	8/10/07	CIO
Complete development of E&IT Procurement Checklist and procedures	8/15/07	Director of Procurement and Contract Services
Schedule workshop for Requesters and notify individuals	8/15/07	Director of Procurement and Contract Services
Meeting with individuals in key roles to review responsibilities and process (Compliance Officer, Technician, Buyer, members of E&IT Procurement Review Team)	8/24/07	508 Compliance Officer
Implement E&IT Procurement Procedure for acquisitions greater than \$50,000	9/1/07	

September 1, 2008 Milestone

Develop and implement E&IT Procurement Procedure for acquisitions greater than \$2,500.
Procurement purchases exempted

Task	Timeline	Responsible Party
With input from focus groups and operational departments, develop pilot process and identify pilot department(s)	2/15/08	Director of Procurement and Contracts, 508 Compliance Officer
Create documentation, forms, etc.	3/15/08	Director of Procurement and Contracts, 508 Compliance Officer
Begin pilot and provide training to pilot Requesters	4/1/08	Director of Procurement and Contracts, 508 Compliance Officer
End pilot and evaluate process	6/1/08	Director of Procurement and Contracts, 508 Compliance Officer
Revise process documentation and forms as needed	7/15/08	Director of Procurement and Contracts, 508 Compliance Officer
Send out communications per communications plan outlined in Component 4	7/15/08	CIO

Development of on-line training (?)	8/1/08	508 Compliance Officer and Technician
Schedule workshops and inform departments of dates	8/1/08	Director of Procurement and Contracts, 508 Compliance Officer
Training of key people in processes	8/15/08	Director of Procurement and Contracts, 508 Compliance Officer
Implementation	9/1/08	Director of Procurement and Contracts, 508 Compliance Officer

September 1, 2009 Milestone

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

Task	Timeline	Responsible Party
With input from focus groups and operational departments, develop pilot process and identify pilot department(s)	2/15/09	Director of Procurement and Contracts, 508 Compliance Officer
Create documentation, forms, etc.	3/15/09	Director of Procurement and Contracts, 508 Compliance Officer
Begin pilot and provide training to pilot Requesters	4/1/09	Director of Procurement and Contracts, 508 Compliance Officer
End pilot and evaluate process	6/1/09	Director of Procurement and Contracts, 508 Compliance Officer
Revise process documentation and forms as needed	7/15/09	Director of Procurement and Contracts, 508 Compliance Officer
Send out communications per communications plan outlined in Component 4	7/15/09	CIO
Development of on-line training (?)	8/1/09	508 Compliance Officer and Technician
Schedule workshops and inform departments of dates	8/1/09	Director of Procurement and Contracts, 508 Compliance Officer
Training of key people in processes	8/15/09	Director of Procurement and Contracts, 508 Compliance Officer
Implementation	9/1/09	Director of Procurement and

		Contracts, 508 Compliance Officer
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September 1, 2010 Milestone

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

Task	Timeline	Responsible Party
With input from focus groups and departments, develop pilot process and identify pilot department(s)	2/15/10	Director of Procurement and Contracts, 508 Compliance Officer
Create documentation, forms, etc.	3/15/10	Director of Procurement and Contracts, 508 Compliance Officer
Begin pilot and provide training to pilot Requesters	4/1/10	Director of Procurement and Contracts, 508 Compliance Officer
End pilot and evaluate process	6/1/10	Director of Procurement and Contracts, 508 Compliance Officer
Revise process documentation and forms as needed	7/15/10	Director of Procurement and Contracts, 508 Compliance Officer
Send out communications per communications plan outlined in Component 4	7/15/10	CIO
Development of on-line training (?)	8/1/10	508 Compliance Officer and Technician
Schedule workshops and inform departments of dates	8/1/10	Director of Procurement and Contracts, 508 Compliance Officer
Training of key people in processes	8/15/10	Director of Procurement and Contracts, 508 Compliance Officer

Appendix A: E&IT Procurement Checklist

An example of an E&IT Procurement Checklist is attached below. See http://www.calstate.edu/Accessibility/EIT_Procurement/ for a Sample E&IT Checklist, Sample E&IT Special Exceptions Documentation, as well as other documents from the Chancellor’s Office.



EIT Procurement Checklist

**Appendix A
for Section 508 Compliance**

Requestor _____ **Requisition Number**

Department/Unit _____ **E&IT Officer Review**

Product Description _____ (include purpose)

Product Users _____ (who will be using & % of total for each type of users: students, employees, public)

Product Usage _____ (how will the product be used)

Cost _____ (estimate the amount of this acquisition)

Initial an appropriate boxes

Pre-Award Action for EIT Procurements

General Exemptions to Section 508 Only E&IT Officer can authorize an exemption

Back-Office (Includes mostly data centers and comm closets type-equipment)

Fundamental Alteration (e.g., cell phones, PDAs, pagers, hand-held devices)

Subparts and Categories for Section 508 Compliance

Subpart B - Technical categories of standards (may require more than one)

Software applications and operating systems (36 CFR part 1194.21)

Web-based internet and intranet information and applications (36 CFR part 1194.22)

Telecommunication products (36 CFR part 1194.23) (phone systems, voice mail systems)

Video and multimedia products (36 CFR part 1194.24) (videos, tv tuners & displays)

Self-contained, closed products (36 CFR part 1194.25) (printers, fax machines, kiosks, ITMs)

Desktop and portable computers (36 CFR part 1194.26)

Subpart C - Functional performance criteria

Subpart D - Information, documentation, and support documentation (always required)

Market Analysis for Section 508 Compliance

All products that meet the functional requirements are 508 conformant

One product meets more 508 standards than the others (attach supporting analysis)

Product previously purchased and is still conformant (e.g., desktop computer contract)

Only one product meets functional specifications (e.g., sole source)(attach justification)

Note: For an EIT procurement to be awarded, it must have a completed procurement checklist and the vendor supplied VPAT. This includes sole source procurements. Exempt and previously purchased products only require a procurement checklist.

Requestor _____ **Date** _____
Signature required to certify accuracy and completeness of the checklist and Section 508 compliance.

508 Compliance Officer _____ **Date** _____