The California State University
OFFICE OF THE CHANCELLOR

Academic and Student Affairs
401 Golden Shore, 6th Floor
Long Beach, CA 90802-4210

www.calstate.edu

Fred E. Wood, Ph.D.
Interim Executive Vice Chancellor

Tel: 562-951-4710
Email: fwood@calstate.edu

March 8, 2021

MEMORANDUM

TO: CSU Presidents

FROM: Fred E. Wood, Ph.D.
Interim Executive Vice Chancellor

SUBJECT: Accessible Technology Initiative (ATI)

Background

The Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973 (504) require that qualified individuals be provided equal access to programs, services and activities. California Government Code 11135 applies Section 508 of the 1973 Rehabilitation Act, as amended in 1998, to state entities and to the California State University (CSU). Section 508 of the Rehabilitation Act was enacted to eliminate barriers in information technology, to make available new opportunities for people with disabilities and to encourage development of technologies that will help achieve these goals.

The CSU policy statement on accessibility is articulated in Executive Order 1111. Implementation of this policy is guided by the Accessible Technology Initiative (ATI) as established in Coded Memo AA-2006-41 and revised in the following coded memos: AA-2007-04, AA-2007-13, AA- 2008-21, AA-2009-19, AA-2010-13, AA-2011-21, AA2013-03 and AA2015-22. This memo supersedes all previous memos.

Vision

All CSU programs, services and activities should be accessible to all students, staff, faculty and the general public. This encompasses all technology products used to deliver academic programs and services, student services, information technology services and auxiliary programs and services.
The ATI implementation approach is driven by the following principles:

- Technology accessibility is an institution-wide responsibility that requires commitment and involvement from leadership across the enterprise.
- Technology for individuals with disabilities must provide access to obtain the same result, gain the same benefit or have the same opportunity to reach the same level of achievement as persons without disabilities.
- The implementation of Universal Design principles should reduce the need for, and costs associated with, individual accommodations for inaccessible technology products.

Key Strategies

The ATI targets the elimination of accessibility barriers across the university. The CSU is using a "capabilities maturity" strategy to achieve its vision for accessibility. This strategy focuses campus and system efforts on continuously improving and institutionalizing business and academic processes that will reliably, sustainably and successfully deliver accessible educational, administrative and community services for all. The implementation of the ATI is based on the following key components:

- **Establish strong administrative/executive support.** The CSU codified its commitment to technology accessibility in Executive Order 1111. Pursuant to EO 1111, campus presidents are charged with appointing a campus ATI executive sponsor, establishing a campus committee and overseeing campus ATI activities.
- **Ensure continuous quality improvement.** Some ATI goals require investments and changes to business procedures that will require time to deploy to our large, diverse CSU community. Just as accessibility barriers often develop over a period of years, remediation activities will sometimes require years to fully implement. During this extended remediation period, the CSU should work to achieve incremental improvements in barrier removal each year.
- **Prioritize projects/activities.** The ATI covers a broad range of technology accessibility goals involving technology products in use across all university programs and services. Given that there are finite resources (e.g. staffing, time and tools) available each year to work on these goals, campuses should select ATI implementation activities that target accessibility barriers with the greatest impact.
- **Identify specific goals/success indicators.** In order to ensure that meaningful progress is made over time, the CSU has collectively established specific ATI goals and success indicators. The broad ATI goals are articulated in the "Goals" subsection below. The success indicators are published and available on the ATI website.
- **Apply capabilities maturity model.** Campus performance on success indicators will be assessed according to levels of organizational capabilities to achieve ATI goals. The levels of organizational capabilities are: Not Started, Initiated, Defined, Established, Managed and Optimized. The levels of organizational capabilities are published and available on the ATI website.
- **Document progress.** It is critical that the CSU document the substantive steps that have been taken over time to remove technology accessibility barriers. This approach establishes a credible institutional commitment to equal access for persons with disabilities and facilitates reporting during campus audits. The CSU ATI implementation therefore utilizes annual campus reports to document progress (discussed further in the "Annual Reports" subsection below).
- **Drive vendor improvements to product accessibility support.** The CSU seeks to improve product accessibility through partnerships and by leveraging the procurement process.

Implementation Goals

Campuses are required to accomplish the ATI goals listed below. Each ATI goal is supported by a set of success indicators that describe the processes, procedures and activities that need to be accomplished in order to meet the goal. As changes in technology occur, the success indicators may be modified following consultation with campus executive leadership.

Web Accessibility Goals

- **Web accessibility evaluation process:** Identify and repair or replace inaccessible websites, applications (web or mobile) and digital content.
- **New website/web application and digital content design and development process:** New website, application (web or mobile) and digital content development complies with all Section 508 accessibility standards.
- **Ongoing monitoring process:** Updating and maintenance of websites, applications (web or mobile) and digital content complies with Section 508 accessibility standards.
- **Training process:** Professional development training has incorporated Section 508 accessibility standards into website and application (web or mobile) development and digital content preparation.
- **Communication process:** In general, the campus community is aware of Section 508 standards to make web-based information available to everyone (students, staff, faculty and the general public), regardless of disability.
- **ATI Web Accessibility Plan:** Campus annually reviews and updates the Web Accessibility Plan.

Procurement Accessibility Goals

- **Procurement processes:** Campus has procurement processes that follow Section 508 requirements for all acquired Information Communication Technology (ICT) products and/or services.
- **Equally Effective Alternate Access Plans:** Equally Effective Access Plans are created for Information Communication Technology (ICT) products that are not fully Section 508 compliant.
- **Training and outreach:** Training and outreach programs are in place for all ICT procurement stakeholders (e.g., buyers, purchase requestors, vendors, etc.)
- **Experience/implementation:** Campuses have sufficient experience and expertise in completing ICT procurements.
- **ATI Procurement Plan:** Annually review and update the ATI Procurement Plan.

Instructional Materials Accessibility Goals

- **Timely adoption of instructional materials:** The campus has implemented a comprehensive plan to ensure the timely adoption of instructional materials, including courses with late-hire faculty or adjunct faculty.
- **Instructor use of Learning Management Systems (LMS) and/or (non LMS) course websites:** The campus has implemented policies and procedures to promote the posting of accessible course materials in the university-approved LMS or other platforms.
- **Accessibility requirements for multimedia, interactive content and emerging instructional technologies:** The campus has implemented policies and procedures to ensure that accessibility has been incorporated into multimedia, interactive content and emerging instructional technologies.
- **Accessibility requirements for course review and remediation:** The campus has implemented procedures to ensure that accessibility requirements have been incorporated into the course review and remediation process.
- **Creation and adoption of accessible instructional materials:** The campus has implemented processes and procedures to support faculty in creating and adopting accessible instructional materials.

- **Communication process and training plan:** The campus has implemented a broad-based ATI awareness campaign, supported by a comprehensive training infrastructure to increase digital accessibility across the campus.
- **ATI Instructional Materials Accessibility Plan:** Annually review and update the ATI Instructional Materials Accessibility Plan.

Implementation Approach

The ATI recognizes that each CSU campus faces unique challenges with implementing the ATI. The implementation approach outlined below was developed in collaboration with the Executive Sponsors Steering Committee (ESSC) and the ATI Priority Area Communities of Practice to ensure that campuses have adequate flexibility to manage their ATI implementation.

Each year, the CSU will make progress toward accomplishing the ATI goals by using a combination of systemwide and campus-based activities. Campuses and the Chancellor's Office will:

- Achieve the baseline status level of "Established" for the success indicators subject to timelines as described below and
- Assess their capacity, select specific success indicators to work on, engage in a variety of projects and activities that address these success indicators, and report on their progress in the ATI Annual Reports.

Systemwide Support and Leadership

The ATI department is part of systemwide Academic Technology Services (ATS) within the Department of Academic Programs, Innovations and Faculty Development within the Division of Academic and Student Affairs. ATS will continue to support ATI in fulfilling its commitment to helping campuses accomplish the ATI goals by engaging in the following activities:

- Supporting campus ATI planning and implementation efforts by developing guidance, providing training resources, sharing significant accomplishments and exemplary practices, and researching promising tools and techniques.
- Coordinating systemwide ATI activities that reduce costs, leverage CSU resources and increase capacity.
- Collaborating with campus leadership through the ATI Leadership Council and Executive Sponsors Steering Committee to implement systemwide accessible technology policy, projects and planning.
- Maintaining effective ongoing communication with key stakeholder groups and consulting with systemwide affinity groups.
- Coordinating the annual report process, including analyzing ATI Annual Reports and distributing systemwide aggregated report results.
- Providing systemwide support to drive improvements to product accessibility support by vendors and publishers.

Campus and Chancellor's Office ATI Responsibilities

Each campus president and the chancellor or the chancellor's designee are responsible for the establishment and implementation of accessible electronic information and technology programs to achieve the goals of ATI. Each campus president and the chancellor will appoint an executive sponsor to guide the ATI implementation at their institution.

The executive sponsor shall

- Regularly attend ESSC monthly meetings and participate in CSU-wide ATI policy development and implementation and other related activities and operations.
- Convene the ATI Steering Committee that includes members from the key stakeholder groups across the institution such as executive administrators, academic and faculty senates, Centers for Faculty Development, Academic Technology Office, Disability Services Office, Equity and Diversity Office and ADA Compliance.

The ATI Steering Committee will oversee the ATI implementation, including

- Reviewing and revising the ATI Plan,
- Meeting the systemwide baseline according to timelines for selected success indicators,
- Implementing projects and activities to meet ATI goals, and
- Documenting progress toward these goals using the ATI Annual Report process.

Each of these responsibilities is described in more detail below.

Reviewing/Revising the ATI Plan

Each year, the executive sponsor, working with the ATI Steering Committee, will review and update their ATI plan to guide their implementation. The plan will indicate the specific success indicators which will focus effort across the three priority areas. The ATI plan template is available on the ATI website to adopt or adapt.

When developing the plan, the executive sponsor and committee will consider the following information:

- Current progress on selected list of success indicators subject to timelines.
- Current progress as described in the annual report, with particular attention to success indicators with a status level of "Not Started" or "Initiated."
- Select ATI implementation activities across all three priority areas that will result in the greatest reduction of technology accessibility barriers.
- Use the ATI Prioritization Framework or a comparable process to consider factors such as impact, probability and capacity when prioritizing ATI implementation activities.
- Deliverables associated with systemwide ATI activities that would advance campus progress if adopted.
- Collaborations that may accelerate or improve the quality of ATI activities.

ATI Baseline/Timeline Process

- Every three years, a set of success indicators with implementation timelines from one to three years shall be agreed upon by Chancellor's Office ATI staff and the Executive Sponsor Steering Committee.
- Success indicators assigned a timeline shall be brought up to the baseline status level of "Established" within the assigned timeline.

Implementing the ATI Plan

Ensuring the accessibility of information technology and resources is a shared responsibility and requires a coordinated, ongoing effort to ensure its success. Executive sponsors should lead the implementation effort through the following activities:

- Conduct regular ATI Steering Committee meetings, no less than twice per year.

- Ensure that the committee membership is comprised of key stakeholder groups and includes members with appropriate experience and expertise to inform decision-making.
- Engage in a periodic administrative review process with the committee regarding challenges, milestones, resources and documenting ongoing progress.
- Monitor, leverage and implement deliverables from systemwide ATI activities that will advance efforts.
- Ensure that committee members monitor, participate in, and contribute to Community of Practice activities.
- Channel ATI communications to appropriate parties.

Documenting ATI Compliance Progress

Campuses and the Chancellor's Office will submit a collection of reports each year which details progress towards accomplishing the ATI goals. The Chancellor's Office ATI department will provide the framework and methodology for submitting ATI annual reports to campuses and the Chancellor's Office.

ATI Annual Report

- Report on the status of all goals and success indicators. Consult the status level definitions; each status level has a set of criteria that must be met. Campus and Chancellor's Office will provide evidence of status levels in their report.
- Document progress toward achieving baseline/timelines on selected success indicators.
- Document the commitment to work on specific success indicators for the following year.
- Submit the annual report signed by the ATI sponsor affirming that the ATI plan was reviewed and revised and the report data is accurate.

President Summary Report

- Progress and remaining effort
    - Summarize the annual report results to the respective campus president or chancellor advising as to the ATI progress being made and remaining effort in each of the priority areas.
- Web performance report
    - Provide summary reports of the overall compliance level of key areas in the campus web environment.
- The Chancellor's Office ATI office will be copied on the report communication.

Distributing the Aggregate ATI Annual Report to CO Executives

The systemwide summary will be presented to the executive vice chancellor for Academic and Student Affairs.

Implementation Timeline

The timeline associated with ATI implementation tasks is provided below.

- July-October: Review/revise the ATI Campus Plan.
- November: Submit the ATI Campus Annual Report and President Summary Report.
- April: Review the systemwide aggregate reports that describe progress across the system.

The Chancellor's Office ATI department will support the implementation timeline through the following activities:

- July: Distribute the Campus Annual Report.
- December-March: Review the Campus Annual Report submissions and prepare systemwide aggregate reports.
- April: Distribute the systemwide aggregate reports that describe progress across the system.
- October of every third year: Conduct the ATI Baseline/Timeline Process to select success indicators and timelines.

If you have questions regarding these guidelines, please contact Dr. Leslie Kennedy, senior director, Academic Technology Services at lkennedy@calstate.edu or (562) 951-4605.

FEW/amw

c: Dr. Joseph I. Castro, Chancellor
Provosts/Vice Presidents for Academic Affairs
Vice Presidents for Student Affairs
Chief Information Officers
ATI Executive Sponsors
Dr. Robert K. Collins, Chair, Academic Senate CSU
Dr. Alison Wrynn, Associate Vice Chancellor, Academic Programs, Innovations and Faculty Development
Dr. Luoluo Hong, Associate Vice Chancellor, Student Affairs and Enrollment Management
Dr. Leslie Kennedy, Senior Director, Academic Technology Services
Ms. Cheryl Pruitt, Director, Accessible Technology Initiative