

Accessible Electronic and Information Technology Procurement Plan

1. Introduction

California Government Code 11135 and CSU Executive Order 926 require the CSU to comply with Section 508 and to apply accessibility standards to electronic and information technology (E&IT) products and services that the CSU buys, creates, uses and maintains. The general, technical and functional requirements of the procurement specifications drive the procurement process. During this process an accessibility determination will be conducted. The assessment of conformance to the accessibility standards is accomplished via the vendor provided Vendor Check List or Voluntary Product Accessibility Template (VPAT). E&IT products and services must meet the applicable accessibility standards unless, an exception applies.

2. Purpose

This procedure is intended to provide the California State University, Los Angeles (CSULA) campus with guidance in the procurement of accessible E&IT goods and services above the formal competitive bid threshold of \$50,000 as required by CSU Executive Order 926 and California Government Code Section 11135. The threshold is per the milestone effective 9/1/07. At the Buyer's option, procurements below the threshold may be formally bid, at which point, this procedure shall apply.

3. 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.

IT Procurement Approval Form – The vehicle by which all computing, media, and telecommunications-related purchases and services are reviewed and approval is indicated. The IT Procurement Approval Form is attached to the Purchase and Campus Stores Requisition (Form 42) for all information resource related procurements.

E&IT Consultant – An ITS staff member who is the Section 508 procurement specialist with responsibility to support the Information Technology Consultants (ITCs) and departments in relation to Section 508 compliance and who shall also participate in the review of E&IT procurement documents. The E&IT Consultant also maintains the E&IT web site.

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

E&IT Procurement Form – Campus form required for all E&IT purchases. The E&IT Procurement Form (Appendix Form 1) is included with the requisition and the IT Procurement Approval Form and submitted to Information Technology Services.

E&IT Exemption Request Form – Campus form to be completed by the department or requestor if the purchase meets one of the eight exemption categories (Appendix Form 8).

Vendor Evaluation Checklist – Document completed by the vendor or supplier to document how their product meets or does not meet the Section 508 standards.

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.

4. Applicability

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

Core functions of Accessible Technology Initiative (ATI) Section 508 Procurement:

- Create functional requirements for purchasing a product;
- Requestor shall 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 identify 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); and
- Document Section 508 accessibility evaluations and conclusions.

This procedure applies to purchases of E&IT **above the formal competitive bid threshold of \$50,000** for goods and/or services, and which fall into one of the following six categories:

- 1) Desktop and portable computers (Appendix Form 2);
- 2) Software applications & Operating Systems (Appendix Form 3);
- 3) Web-based intranet and internet Information & Applications (Appendix Form 4);
- 4) Video and multimedia product including television displays and computer equipment with display circuitry that receives, decodes and displays broadcasts, cable, videotape and DVD signals (Appendix Form 5);
- 5) Telecommunications products (Appendix Form 6); and/or

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- 6) Self-contained, closed products that have embedded software and include, but are not limited to: information kiosks, information transaction machines, copiers, printers, calculators and fax machines (Appendix Form 7).

If the requisition is not E&IT or is E&IT but is below the formal competitive bid threshold of \$50,000, the Accessibility Procurement requirements DO NOT APPLY. The procurement shall follow the established purchasing procedures as detailed in CSU's Policy Manual for Contracts and Procurement.

Outline of Procurement Process

The requirements of applicable laws and regulations for the acquisition of goods and services by CSULA are defined within the CSU Policy Manual for Contracting and Procurement Formal Competitive Procurements. E&IT procurements that are subject to formal competition requirements will require the Requestor to conduct market research with regard to the commercial availability of accessible products. As a result of the market research, the Requestor will provide suggested sources. This information will be used to develop formal solicitation documents, which will require vendors to submit Section 508 compliance documentation.

The Requestor and the Information Technology Consultant (ITC), with assistance from the E&IT Consultant and Buyer, will determine the criteria and its relative weighting that will be used to evaluate the documents submitted by the vendor to verify the degree of compliance with Section 508 requirements. 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. CSULA 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 – E&IT requirements do not apply.

Based on the results of the market research conducted or the proposals evaluated, the E&IT products will fall within one of the following categories:

- All products that meet the functional requirements are Section 508 conformant – meet 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 – implementation of E&IT acquisitions equal to or below \$50,000 is scheduled for no later than September 1, 2008.
- 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 approved. The Buyer may purchase the product in accordance with applicable procurement policies and procedures.

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Exemptions

E&IT products and services must meet the applicable accessibility standards unless one of the following exceptions applies. If a department/division determines that compliance with any provision of the accessibility standards is exempt, the E&IT Exemption Request Form (Appendix Form 8) must be completed and submitted along with the E&IT Procurement Approval Form to Information Technology Services. Each exemption will be reviewed on a case-by-case basis by the E&IT Compliance Team.

1. The E&IT procurement for products to be acquired by a contractor incidental to a contract is exempt. For example, the vendor buys software in order to develop a web site for CSULA. The software used by the vendor to develop the web site does not have to conform to the accessibility standards. However, the web site is required to conform to the standards since the web site is the purpose of the contract.
2. Back Office - This E&IT exemption is for products located in spaces frequented only by service personnel for maintenance, repair, or occasional monitoring. These products are not human-interactive. This normally includes products in a data center or telecommunications closet. However, if a product is in the data center, but can be controlled via remote access, then the product must be Section 508 compliant. Or, if the same product is to be installed in an office, it would have to be compliant.
3. Commercially Non-Available – At the time of procurement, a product that meets all the functional specifications does not have features to meet all the appropriate Section 508 standards. In some cases, the vendor’s product may comply with some, but not all the standards. If that vendor has the most compliant product, then the standards that the vendor cannot comply with are considered commercially non-available.
4. Sole Brand – Only one product meets the functional specifications required. A completed and approved Sole Brand Request with an E&IT form shall be exempt from Section 508 requirements.
5. Service and maintenance agreements for technical support of hardware.
6. Future incorporation of Section 508 standards – If a product does not meet Section 508 standards, the vendor may submit a statement explaining past complaints, workarounds, and plans (with implementation timeframes) to incorporate accessibility.
7. Fundamental Alteration – The campus 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.
8. Undue Burden – The acquisition of the accessible products would cause significant difficulty or expense to the California State University system. The President shall have the final authority to approve or disapprove the undue burden request.

Procurement Review Processes

The processes below shall be used to review the procurement as required:

- Research – Conduct cost analysis to determine the net cost to the organization in procuring a product that conforms to Section 508 standards.

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- Evaluation – Evaluation of the cost analysis must factor in the long-term reduction in cost incurred by the CSULA in providing access or accommodations to future users of this technology who are persons with disabilities.
- Documentation – Cost analysis and supporting documentation.
- Verification – Cost analysis should also be reviewed by appropriate departments with insight to the cost elements contained within the cost analysis – such as Financial Services.
- Determination – Requestor, ITC, Buyer, and ITS to be included in the process to determine that proof of an increase of expense to CSULA is justifiable and supportable.

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 requestor shall consider the resources available to the campus 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 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 shall complete E&IT Exemption Request Form with a detailed explanation addressing each of the components of an undue burden.

The components of an undue burden request 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; and
 - All funds available to the 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;
- Market research performed to locate items that meet the applicable technical provisions;
- Proposed method of alternate access and its estimated cost;
- Time schedule on when it will no longer be an undue burden to the organization; i.e., product will be conformant; and/or
- Resubmission of undue burden request every two years until the product is conformant.

The Requestor shall forward the E&IT Purchase Approval Request, E&IT Exemption Request along with the Purchase Requisition to the division ITC for initial review and approval. The ITC shall forward the procurement package to the division dean/manager and the appropriate Vice

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President for review and approval of the E&IT Exemption Request. The procurement package will be reviewed by the E&IT Compliance Team and a recommendation is forwarded to the Vice President of Information Technology Services (VPITS). The VPITS will forward his recommendation to the Vice President of Administration & Finance and the President for final approval or denial.

A copy of the final determination of the undue burden request shall be retained by Procurement in the Purchase Order file. Procurement 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.

Process for Determining Fundamental Alteration

CSULA is not required to make changes in the fundamental characteristics of a product to comply with Section 508 accessibility standards. Accessibility standards do 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 has been applied to hand-held devices.

The Requestor and ITC shall be cognizant of the technology in the product field to ensure that the exemption is valid. The determination of fundamental alterations includes the following steps:

- Determine the functional requirements and the specific need for the E&IT product;
- Review the accessibility of the product and the impact of the accessible product to the functional requirements;
- Complete the E&IT Exemption Request Form and an explanation of how compliance with Section 508 will alter the fundamental characteristics of the product; and
- Provide vendor product documentation to support explanation.

The ITC shall review the initial E&IT Exemption Request and supporting documentation. If approved, the procurement package is forwarded to the division dean/manager for review and approval. The package is forwarded to the ITS Office for review by the E&IT Compliance Team and a recommendation is forwarded to the Vice President of Information Technology Services.

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.

Human Resources, E&IT Consultant, and/or OSD shall evaluate existing plans and modify as required 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 students, members of the public, and employees with disabilities;
- Protocol around 504/ADA accommodations including the process for providing access to E&IT resources;

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- 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; and
- A feedback mechanism to evaluate the effectiveness of the solutions.

ITC and Requestor in consultation with appropriate offices will assess the potential impact on students, employees, and members of the public of items purchased that are not E&IT compliant. For every exemption granted for an 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.

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

Communication Process

Communications is the methodology to explain or educate the CSULA campus community on Section 508, answer questions, and address concerns.

General communications on Section 508 overall

- Establish an Accessibility web site that provides information and allows discussions of current issues.

Communications for specific implementation phases

- Send emails to targeted individuals to explain the impending process and how it will impact their areas of responsibility. The emails 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.
- Send email in advance of the training to remind individuals to attend scheduled trainings.
- Participate in general communication efforts with campus.

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.

Training Process

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

Overall

- ITC Training:
 - Comprehensive segment on the ITC's roles and responsibilities;

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- Available resources and support sources;
 - Guides, tips and hints on how to be a Section 508 ITC and what to expect;
 - Better understanding of the law and exemptions; and
 - Discussion on his/her concerns and issues and possible solutions for them.
- Buyer Training (Procurement Office):
 - Comprehensive segment on Section 508;
 - Better understanding of the law and how it impacts on procurement; and
 - Buyer's roles and responsibilities.

For Each Implementation

- Requestors Training:
 - Requestor's roles and responsibilities;
 - Available resources and support sources; and
 - Discussion on his/her concerns and issues and possible solutions for them.
- Buyers, Requestors, and ITCs:
 - Section 508 law and the overall process;
 - How to process an E&IT acquisition request;
 - Forms, checklists and procedures;
 - Market research and evaluating the vendor documentation; and
 - Roles and responsibilities of others in the process.

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

Evaluation Goal

The goal is for 100% of purchase requests over \$50,000 to comply with Section 508 requirements. This goal is met by enforcing the process outlined in Component 1.

Components of Goal:

- Market research: Review and verification of vendor product information. Process should result in a list of suggested vendors.
- Section 508 compliance documentation: Review and verify conformance of the product against vendor documentation such as completed Vendor Checklist or VPAT. Verification will also come from the testing protocol signed by the one charged with conducting conformance testing of the product.
- Exemptions: Verified by the ITC and appropriate approval signature(s) from division dean/manager and Vice President.
- Buyer purchased E&IT products as outlined by the Section 508 law: Verified through random sampling of purchase orders/contracts.

Evaluation methodology

Self-check to be performed by randomly selecting and reviewing a sample of E&IT acquisitions twice a year. The review will verify that the Section 508 documentation has been completed and included in the procurement files.

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Evaluation 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 requisitions that have the proper Section 508 documentation; and
- E&IT products procured meet the requirements as outlined by the Section 508 law.

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

Component 6: Identification of roles and responsibilities.

Responsibilities associated with the following roles are listed below:

Requestor

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

- Develops functional requirements for the requested products or services;
- Conducts market research to identify sources that meet the functional requirements;
- Determines which accessibility categories are applicable for the product;
- Evaluates the vendor responses to Section 508 compliance;
- Verifies the Section 508 compliance information submitted;
- Provides Section 508 documentation for the purchasing file;
- Obtains ITC review and approval (if necessary) of Section 508 compliance determination;
- Provides the purchase request along with the approved E&IT documentation to the ITS office for review;
- 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; and
- Informs department responsible for Section 504/508 compliance on requirements for alternate access.

ITC

The ITC will provide technical support to the Requestors.

- Assists Requestor with functional requirements and market research;
- Assists Requestor with the review and evaluation of vendor Section 508 documentation;
- Evaluates E&IT procurement forms and vendor documents and indicate the appropriate product analysis;
- Evaluates exemption requests and determines the technical credibility of the request.

Buyer

This individual is responsible for the actual procurement of the E&IT product or service. With respect to the ATI Section 508 requirements, the Buyer is responsible for reviewing the E&IT documentation to verify the proper approvals has been obtained and the proper documentation has been submitted to be included into the procurement file:

- Processes properly documented E&IT purchase requests;

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- Considers only vendors for the purchase who have complied with Section 508 documentation requirements;
- Purchases product per the market research and according to CSULA policies and procedures; and
- Ensures that Section 508 requirements are contained in contracts awarded.

E&IT Consultant

An E&IT Consultant provides the interface between Section 508 requirements and technical specifications. The E&IT Consultant 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. The E&IT Consultant:

- Evaluates Vendor Checklist or VPAT to determine Section 508 compliance;
- Evaluates and approves E&IT Procurement requests;
- Evaluates products to determine the technical credibility of an exemption and recommends approval of the E&IT Exemption Request;
- Works with the Buyer on technical questions and issues during the E&IT acquisition process;
- Participates, as the Section 508 technical representative, in strategic planning of campus E&IT requirements (e.g., software development, training);
- Serves as a member of the E&IT Compliance Team;
- Acts as liaison on Section 508 matters with management;
- Works with Human Resources and Office for Students with Disabilities on issues, especially E&IT reasonable accommodation problems; and
- Develop and maintain the E&IT web site.

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

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September 1, 2007 Milestone

The E&IT Procurement team will develop and implement E&IT Procurement Procedures for acquisitions greater than \$50,000 following the timeline below:

Task	Timeline
Start working on forms, procedures, instructions and training.	6/15/07
Create train-the-trainer courses.	8/15/07
Conduct train-the-trainer courses.	9/15/07
Schedule training classes and notify individuals.	8/20/07
Submission of E&IT Procurement Plan.	8/10/07
Define Communication Process.	9/15/07
Start training key people in the ATI procurement processes.	8/30/07
Create centralized special team that can help the Requestors and ITCs with legal and process questions.	9/15/07
Implement E&IT Procurement Procedure for acquisitions greater than \$50,000.	9/1/07

September 1, 2008 Milestone

The E&IT Procurement team will develop and implement E&IT Procurement Procedure for acquisitions greater than \$2,500, Procard purchases exempted:

Task	Timeline
Start development of procurement policies.	3/15/08
Start development of procurement procedures.	4/15/08
Start working on forms, instructions, training, and communications.	7/15/08
Initiate communications with stakeholders.	8/15/08
Start training of key people.	8/15/08
Implement E&IT Procurement Procedure for acquisitions greater than \$2,500, Procard purchases exempted.	9/1/08

September 1, 2009 Milestone

The E&IT Procurement team will develop and implement E&IT Procurement Procedure for all acquisitions greater than \$2,500.

Task	Timeline
Start development of procurement policies.	3/15/09
Start development of procurement procedures.	4/15/09
Start working on forms, instructions, training, and communications.	7/15/09
Initiate communications with stakeholders.	8/15/09
Start training of key people.	8/15/09
Implement E&IT Procurement Procedure for acquisitions greater than \$2,500.	9/1/09

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September 1, 2010 Milestone

The E&IT Procurement team will develop and implement E&IT Procurement Procedure for acquisitions less than or equal to \$2,500.

Task	Timeline
Start development of procurement policies.	3/15/10
Start development of procurement procedures.	4/15/10
Start working on forms, instructions, training, and communications.	7/15/10
Initiate communications with stakeholders.	8/15/10
Start training of key people.	8/15/10
Implement E&IT Procurement Procedure for acquisitions less than or equal to \$2,500.	9/1/10

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Appendices - Forms

- 1 Electronic & Information Technology (E&IT) Procurement Approval Form
- 2 Vendor Evaluation Checklist – Desktop and Portable Computers
- 3 Vendor Evaluation Checklist – Software Applications and Operating Systems
- 4 Vendor Evaluation Checklist – Web-based Intranet and Internet Information and Applications
- 5 Vendor Evaluation Checklist – Video and Multimedia Products
- 6 Vendor Evaluation Checklist – Telecommunication Products
- 7 Vendor Evaluation Checklist – Self-contained, Closed Products
- 8 Electronic & Information Technology (E&IT) Exemption Request Form
- 9 E&IT Procurement Approval Process Map

Office Memorandum

DATE: August 3, 2007

TO: Mary Cheng, Director
Accessible Technology Initiative

FROM: Peter Quan, Vice President/Chief Technology Officer
Information Technology Services

Anthony Ross, Vice President
Student Affairs

COPIES: K. Button, D. Cardoza, S. Garcia, J. M. Rosser

SUBJECT: CSU Los Angeles Accessible Electronic and Information Technology
Procurement Plan

CSU Los Angeles' Accessible Electronic and Information Technology Procurement Plan for acquisitions over \$50,000 is attached. Since this is our initial effort at addressing accessibility in procurement, we are looking forward to your comments to assist us as we continue to develop our plan over time to address all procurements.

Through participation in the CSU Procurement Community of Practice (COP), our Procurement working group has followed the direction of the COP, basing our plan on the CSU Electronic and Information Technology Procurement Plan Template dated June 1, 2007, and the draft processes developed by our working group. We expect that aspects of our plan will change when we actually put it into practice and determine those processes and procedures that work as anticipated and those that are not workable as originally envisioned. That experience will further develop our processes and allow us to continue to improve subsequent versions of our plan. We also expect that as other campuses post their plans, COP members will compare and collaborate to improve the next iteration of all our plans.

Please feel free to contact us if you have any questions regarding the plan.



Electronic & Information Technology (E&IT) Procurement Approval Form

This form must be filled out for all E&IT purchases greater than \$50,000

California Government Code 11135 requires the CSU to comply with Section 508 and to apply accessibility standards to electronic and information technology (E&IT) products and services that the CSU buys, creates, uses and maintains. The general, technical and functional requirements of the procurement specifications drive the procurement process. Accessibility determination is conducted in the evaluation. The assessment of conformance to the accessibility standards is accomplished via the vendor provided Vendor Evaluation Checklist or Voluntary Product Accessibility Template (VPAT).

If a VPAT is not available or the product does not meet Section 508 standards, the vendor must provide written statements to answer the following questions and you must request an exemption to the standard by completing the E&IT Exemption Request form.

- What has your company done to evaluate the accessibility of your product?
- Do you know of any problems or received any complaints regarding the accessibility of your product?
- If you know of accessibility products, what workarounds have you identified or would you recommend?
- What is your company planning in the next year or so to incorporate accessibility into the product?

E&IT products and services must meet the applicable accessibility standards unless an exception applies. If a department determines that an exemption applies, they must complete the E&IT Exemption Request form.

Requestor Information

Contact Name	Office Extension	Office Location
Department	College/Division	Mail Code
ITC Name (Print)	ITC Approval	Dept/Unit Manager Approval

Product Description & Function

Section 508 Compliance Categories

Check all that apply. Vendor must complete the applicable Vendor Evaluation Checklist or VPAT.

Appendix #

Desktop and portable computer equipment (PCs, laptops)	2
Software Application & Operating System	3
Web-based Information & Applications	4
Video and Multimedia Product (TVs, DVDs, etc.)	5
Telecommunication Products	6
Self-contained, closed products w/embedded software (Copiers, printers, calculators, fax machines)	7

ITC Analysis

Indicate the results of your product analysis. Please attach all Vendor Evaluation Checklists or VPATs obtained during the evaluation of this product.

<input type="checkbox"/>	All products meet the functional requirements and are 508 compliant.
<input type="checkbox"/>	One product meets more 508 standards than the other (attach supporting analysis).
<input type="checkbox"/>	The product was previously purchased and is still compliant.
<input type="checkbox"/>	Only one product meets the technical and functional specifications (attach a sole source justification and complete E&IT Exemption Request form).
<input type="checkbox"/>	No accessible version of this product is available in the marketplace. It is commercially non-available. (complete the E&IT Exemption Request form)
<input type="checkbox"/>	Product does not meet 508 standards, but the vendor has provided a plan to incorporate accessibility into the product (complete the E&IT Exemption Request form).

FOR ITS/PURCHASING USE ONLY

COMMENTS	
REVIEW	<input type="checkbox"/> E&IT Consultant _____ <input type="checkbox"/> ITS _____
VP ITS APPROVAL	DATE
DIRECTOR OF PROCUREMENT & CONTRACTS	DATE



Vendor Evaluation Checklist
Desktop and Portable Computers

An E & IT procurement cannot be processed or awarded without completion and submission of the Vendor Evaluation Check list. Responses to "Meet Standard and How" and "Not Applicable and Why" must be completed in detail. Simple comments like "yes" or "comply" are not acceptable. A valid VPAT may be used in lieu of the Vendor Evaluation Checklist.

Question	Meet Standard and How	Do Not Meet Standard	Not Applicable and Why
(a)(1) Are all mechanically operated controls and keys tactilely discernible without activating the controls or keys?			
(a)(2.i) Are all mechanically operated controls and keys operable with one hand and do not require tight grasping, pinching, or twisting of the wrist?			
(a)(2.ii) Is the force required to activate controls and keys 5 lbs. (22.2 N) maximum?			
(a)(3.i) If key repeat is supported, is the delay before repeat adjustable to at least 2 seconds?			
(a)(3.ii) If key repeat is supported, is the repeat rate adjustable to 2 seconds per character?			
(a)(4) Is the status of all locking or toggle controls or keys visually discernible, and discernible either through touch or sound?			
(b)(2.ii) If the product uses touch screens or touch-operated controls, is the force required to activate controls and keys 5 lbs. (22.2 N) maximum?			
(b)(3.i) If the product uses touch screens or touch-operated controls, and key-repeat is supported, is the delay before repeat adjustable to at least 2 seconds?			
(b)(3.ii) If the product uses touch screens or touch-operated controls, and key-repeat is supported, is the repeat rate adjustable to 2 seconds per character?			
(b)(4) If the product uses touch screens or touch-operated controls, is the status of all locking or toggle controls or keys visually discernible, and discernible either through touch or sound?			
(c) If biometric forms of user identification or control are used, is there an alternative form of identification or activation, which does not require the user to possess particular biological characteristics?			
(d) If provided, is at least one of each type of expansion slots, ports and connectors compliant with publicly available industry standards?			



Vendor Evaluation Checklist
Software Applications and Operating Systems

An E & IT procurement cannot be processed or awarded without completion and submission of the Vendor Evaluation Check list. Responses to "Meet Standard and How" and "Not Applicable and Why" must be completed in detail. Simple comments like "yes" or "comply" are not acceptable. A valid VPAT may be used in lieu of the Vendor Evaluation Checklist.

Question	Meet Standard and How	Do Not Meet Standard	Not Applicable and Why
(a) If software is designed to run on a system that has a keyboard, are product functions executable from a keyboard where the function itself or the result of performing a function can be discerned textually?			
(b.i) Does the application avoid disrupting or disabling activated features of other products that are identified as accessibility features (where those features are developed and documented according to industry standards)?			
(b.ii) Does the application avoid disrupting or disabling activated features of any operating system that are identified as accessibility features (where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer)?			
(c.i) Is a well-defined on-screen indication of the current focus (e.g., arrow pointer) provided that moves among interactive interface elements as the input focus changes?			
(c.ii) Is the focus programmatically exposed so that AT can track focus and focus changes?			
(d.i) Is there sufficient information about each user interface element (including the identity, operation and state of the element) available to AT?			
(d.ii) If an image represents a program element, is the information conveyed by the image also available in text?			
(e) If bitmap images are used to identify controls, status indicators, or other programmatic elements, is the meaning assigned to those images consistent throughout an application's performance?			
(f) Is textual information provided through operating system functions for displaying text? (Minimum information that shall be made available is text content, text input caret location, and text attributes.)			

(g) Does the application avoid overriding user-selected contrast and color selections and other individual display attributes?			
(h) If animation is displayed, is information displayable in at least one non-animated presentation mode at the option of the user?			
(i) Does the application avoid using color coding as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element?			
(j) If the product permits a user to adjust color and contrast settings, is a variety of color selections capable of producing a range of contrast levels provided?			
(k) Does the software avoid using flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz?			
(l) If electronic forms are used, does the form allow people using AT to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues?			



Vendor Evaluation Checklist

Web-based Intranet and Internet Information and Applications

An E & IT procurement cannot be processed or awarded without completion and submission of the Vendor Evaluation Check list. Responses to "Meet Standard and How" and "Not Applicable and Why" must be completed in detail. Simple comments like "yes" or "comply" are not acceptable. A valid VPAT may be used in lieu of the Vendor Evaluation Checklist.

Question	Meet Standard and How	Do Not Meet Standard	Not Applicable and Why
(a) Is there a text equivalent (e.g., via "alt", "longdesc", or in element content) for every non-text element?			
(b) For any multimedia presentations, are there equivalent alternatives and are they synchronized with the presentation?			
(c) Is all information conveyed with color also available without color (e.g. from context or markup)?			
(d) Are documents organized so they are readable without requiring an associated style sheet?			
(e) Are redundant text links provided for each active region of a server-side image map?			
(f) Are client-side image maps provided, instead of server-side image maps (except where the regions cannot be defined with an available geometric shape)?			
(g) Are row and column headers identified for data tables?			
(h) Is markup used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers?			
(i) Are frames titled with text that facilitates frame identification and navigation?			
(j) Are pages designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz?			
(k.i) Is a text-only page, with equivalent information or functionality, provided? (This is to ensure that a web site complies when compliance cannot be accomplished in any other way.)			
(k.ii) Is the content of the text-only page updated whenever the primary page changes?			
(l) If pages use scripting languages to display content, or to create interface elements, is the information provided by the script identified with functional text that can be read by AT?			

<p>(m) If a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, does the page provide a link to a plug-in or applet that complies with §1194.21, the technical standards for Software Applications and Operating Systems, (a) through (l)?</p>			
<p>(n) If electronic forms are designed to be completed on-line, does the form allow people using AT to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues?</p>			
<p>(o) Is a method provided that permits users to skip repetitive navigation links?</p>			
<p>(p) If a timed response is required, is the user alerted and given sufficient time to indicate more time is required?</p>			



Vendor Evaluation Checklist
Video and Multimedia Products

An E & IT procurement cannot be processed or awarded without completion and submission of the Vendor Evaluation Check list. Responses to "Meet Standard and How" and "Not Applicable and Why" must be completed in detail. Simple comments like "yes" or "comply" are not acceptable. A valid VPAT may be used in lieu of the Vendor Evaluation Checklist.

Question	Meet Standard and How	Do Not Meet Standard	Not Applicable and Why
(a.i) Are all analog television displays 13 inches and larger, and computer equipment that includes analog television receiver or display circuitry, equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals?			
(a.ii) Are wide screen digital television (DTV) displays measuring at least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically, and stand-alone DTV tuners, whether or not they are marketed with display screens, and computer equipment that includes DTV receiver or display circuitry, equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals?			
(b) Are television tuners, including tuner cards for use in computers, equipped with secondary audio program playback circuitry?			
(c) Are all training and informational video and multimedia productions (which support the agency's mission, regardless of format, that contain speech or other audio information necessary for the comprehension of the content) open or closed captioned?			
(d) Are all training and informational video and multimedia productions (which support the agency's mission, regardless of format, that contain visual information necessary for the comprehension of the content) audio described?			
(e) Is the display or presentation of alternate text presentation or audio descriptions user-selectable unless permanent?			



Vendor Evaluation Checklist
Telecommunications Products

An E & IT procurement cannot be processed or awarded without completion and submission of the Vendor Evaluation Check list. Responses to "Meet Standard and How" and "Not Applicable and Why" must be completed in detail. Simple comments like "yes" or "comply" are not acceptable. A valid VPAT may be used in lieu of the Vendor Evaluation Checklist.

Question	Meet Standard and How	Do Not Meet Standard	Not Applicable and Why
(a.i) Does telecommunications product/system (which provides functions allowing voice communication but which does not itself provide TTY functionality) provide a standard non-acoustic connection point for TTYs?			
(a.ii) Are any microphones capable of being turned on and off to allow the user to intermix speech with TTY use?			
(b) Do telecommunications products (which include voice communication functionality) support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols?			
(c) Are voice mail, auto-attendant, and interactive voice response telecommunications systems usable by TTY users with their TTYs?			
(d.i) Do voice mail, messaging, auto-attendant, and interactive voice response telecommunications systems (that require a response from a user within a time interval) give an alert when the time interval is about to run out?			
(d.ii) Do voice mail, messaging, auto-attendant, and interactive voice response telecommunications systems (that require a response from a user within a time interval) provide sufficient time for the user to indicate that more time is required?			
(e) If provided, are caller identification and similar telecommunications functions also available for users of TTYs and for users who cannot see displays?			
(f.i) For transmitted voice signals, do telecommunications products provide a gain adjustable up to a minimum of 20 dB?			
(f.ii) For incremental volume control, is at least one intermediate step of 12 dB of gain provided?			
(h) If telecommunications product delivers output by an audio transducer which is normally held up to the ear, is there a means provided for effective magnetic wireless coupling to hearing technologies?			

(i) Is interference to hearing technologies (including hearing aids, cochlear implants, and assistive listening devices) reduced to lowest possible level that allows a user of hearing technologies to use the telecommunications product?			
(j.i) Do products that transmit or conduct information or communication, pass through cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable format?			
(j.ii) Have technologies which use encoding, signal compression, format transformation, or similar techniques not removed information needed for access or have the capability to restore it upon delivery?			
(k)(1) If product has mechanically operated controls or keys, are controls and keys tactilely discernible without activating the controls or keys?			
(k)(2.i) If the product has mechanically operated controls or keys, are controls and keys operable with one hand and do not require tight grasping, pinching, or twisting of the wrist?			
(k)(2.ii) If product has mechanically operated controls or keys, is force required to activate controls/keys 5 lbs. (22.2 N) maximum?			
(k)(3.i) If the product has mechanically operated controls or keys, and key repeat is supported, is the delay before repeat adjustable to at least 2 seconds?			
(k)(3.ii) If the product has mechanically operated controls or keys, and key repeat is supported, is the repeat rate adjustable to 2 seconds per character?			
(k)(4) If product has mechanically operated controls or keys, is the status of all locking or toggle controls or keys visually discernible, and discernible either through touch or sound?			



Vendor Evaluation Checklist
Self-Contained, Closed Products

An E & IT procurement cannot be processed or awarded without completion and submission of the Vendor Evaluation Check list. Responses to "Meet Standard and How" and "Not Applicable and Why" must be completed in detail. Simple comments like "yes" or "comply" are not acceptable. A valid VPAT may be used in lieu of the Vendor Evaluation Checklist.

Question	Meet Standard and How	Do Not Meet Standard	Not Applicable and Why
(a) Are products usable by people with disabilities without requiring them to attach AT to product? (Personal headsets for private listening are not AT.)			
(b) If a timed response is required, is the user alerted and given sufficient time to indicate more time is required?			
(c)(1) If product uses touch screens or contact-sensitive controls, are controls/keys tactilely discernible without activating controls or keys?			
(c)(2.i) If the product utilizes touch screens or contact-sensitive controls, are controls and keys operable with one hand and do not require tight grasping, pinching, or twisting of the wrist?			
(c)(2.ii) If product uses touch screens or contact-sensitive controls, is force required to activate controls and keys 5 lbs. (22.2 N) maximum?			
(c)(3.i) If product uses touch screens or contact-sensitive controls, and key-repeat is supported, is the delay before repeat adjustable to at least 2 seconds?			
(c)(3.ii) If product uses touch screens or contact-sensitive controls, and key-repeat is supported, is repeat rate adjustable to 2 seconds per character?			
(c)(4) If product uses touch screens or contact-sensitive controls, is status of all locking or toggle controls or keys visually discernible, and discernible either through touch or sound?			
(d) If biometric forms of user identification or control are used, is an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, provided?			
(e.i) If products provide auditory output, is the audio signal provided at a standard signal level through an industry standard connector that will allow for private listening?			
(e.ii) If products provide auditory output, does the product provide the ability to interrupt, pause, and restart the audio at any time?			

(f.i) If the product delivers voice output in a public area, is incremental volume control provided with output amplification up to a level of at least 65 dB?			
(f.ii) If the product delivers voice output in a public area, and the ambient noise level of the environment is above 45 dB, is a volume gain of at least 20 dB above the ambient level user selectable?			
(f.iii) If the product delivers voice output in a public area, is there a function provided to automatically reset the volume to the default level after every use?			
(g) Are other of means besides color coding used to convey information, indicate an action, prompt a response, or distinguish a visual element?			
(h) If a product permits a user to adjust color and contrast settings, is a range of color selections capable of producing a variety of contrast levels provided?			
(i) Is the product designed to avoid screen flickering with a frequency greater than 2 Hz and lower than 55 Hz?			
(j)(1) If the product is freestanding, non-portable, and intended to be used in one location, and has operable controls, is the position of any operable control (determined with respect to a vertical plane, which is 48 inches in length, centered on the operable control, and at the maximum protrusion of the product) within the 48 inch length?			
(j)(2) If product is freestanding, non-portable, and intended to be used in one location, and has any operable controls that are 10 inches or less behind the reference plane, is the height 54 inches maximum and 15 inches minimum above the floor?			
(j)(3) If the product is freestanding, non-portable, and intended to be used in one location, and has operable controls (where any operable control is more than 10 inches and not more than 24 inches behind the reference plane) is the height 46 inches maximum and 15 inches minimum above the floor?			
(j)(4) If the product is freestanding, non-portable, and intended to be used in one location, and has operable controls, are operable controls within 24 inches behind the reference plane?			



Electronic & Information Technology (E&IT) Exemption Request Form

Complete this form if you are requesting an exemption from Section 508 of the Rehabilitation Act of 1973.

Requestor Information

Contact Name	Office Extension	Office Location
Department	College/Division	Mail Code
ITC Name (Print)	ITC Approval	Dept/Unit Manager Approval

Product Description & Function

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E&IT products and services must meet the applicable accessibility standards unless one of the following exemptions applies. The Requestor must provide an explanation and supporting documentation as to how this purchase meets the requested exemption.

Exemption Categories

Check the exemption category you are requesting and attach an explanation of how this purchase meets the requested exemption. **In all cases you must include an explanation of how alternative means of access will be provided that will allow individuals with disabilities to use the product or service.**

<input type="checkbox"/>	1. Products to be acquired by a contractor are incidental to the contract.
<input type="checkbox"/>	2. Back Office – products located in spaces frequented only by service personnel in telecommunication closets or data centers.
<input type="checkbox"/>	3. Commercially Non-Available – product meets all functional specifications but does not have features to meet Section 508 standards.
<input type="checkbox"/>	4. Product does not meet Section 508 standards but the vendor has provided a written statement regarding future plans to incorporate accessibility.
<input type="checkbox"/>	5. Sole Brand – only one product meets the functional specification required. (Requires a completed Sole Brand form.)
<input type="checkbox"/>	6. Annual agreements for hardware service and maintenance.
<input type="checkbox"/>	7. Fundamental Alteration – in order to comply with section 508 standards, the product would have to change its fundamental characteristics.
<input type="checkbox"/>	8. Undue Burden – acquisition of the accessible product would cause significant expense to the entire California State University system. (Requires Division VP and Presidential approvals.)

Division Approvals

I have determined that acquisition of the applicable E&IT product(s) or service(s) required by my department are subject to Section 508 of the Rehabilitation Act of 1973, and codified in California Government Code 11135, is/are exempt from Section 508 standards as stated above.	
Dean/Manager Approval	Date
VP Approval (Required for Undue Burden exemptions)	Date

FOR ITS/PURCHASING USE ONLY

COMMENTS	
REVIEW <input type="checkbox"/> E&IT Consultant _____ <input type="checkbox"/> E&IT Compliance Team _____ <input type="checkbox"/> Other _____	
VP ITS APPROVAL	DATE
DIRECTOR OF PROCURMENT AND CONTRACTS APPROVAL	DATE
VICE PRESIDENT ADMINISTRATION & FINANCE	DATE
PRESIDENT APPROVAL (Required for Undue Burden exemptions)	DATE

Appendix 9: Accessibility Equipment & Information Technology Procurement Process Map

