

## Year 2 Procurement Annual Report – Due August 15, 2008

In compliance with the Americans with Disabilities Act of 1990 (ADA), Section 508 of the 1973 Rehabilitation Act (as amended in 1998), and California State University Coded Memorandum AA-2007-04, annual reporting of the implementation of the Accessible Technology Initiative is required of all CSU campuses. This report focuses on Priority Three: Accessible Electronic and Information Technology (E&IT) Procurement, due August 15, 2008.

The topics identified in this form address your original plan from 2007 and provide a narrative description of your progress as well as obstacles in achieving your goals. Please provide updates to your original plan, reporting on significant tasks that were completed; what you expect to accomplish next year; areas of difficulty and barriers to completion; and any comments on your observations and discoveries. You may provide any attachments that you believe are relevant to this report.

<b>1. Have you refined or changed your procedures from those you described in your 2007 plan? If so, please explain.</b>	
1a. Accomplishments in 2007/2008	Completed first full year at the \$50,000 threshold. Processed over 10 requisitions requiring Voluntary Product Accessibility Template (VPAT) submittal and review. Initiated training of the campus with a presentation to the Financial Officers. Created a VPAT library to facilitate the processing of repeat equipment.
1b. Plans for 2008/2009	Plans include a general training of campus users plus an in-depth training of campus Information Technology Consultants (ITCs). Also planned is a reduction in the threshold to \$15,000 in September 2008.
1c. Barriers to completion	The reduction to \$15,000 will be difficult due to the volume of work and the delays imposed on campus schedules. These delays are even more critical at year end. There is also a paucity of trained personnel who can resolve VPAT related issues and educate the suppliers as to CSULA's needs. This is being addressed through the training of the campus ITCs. The barrier to training the ITCs is the lack of a training program and trainers.
1d. Observations/discoveries	The ITS review process already in place has proved invaluable in implementing the system review. The issue remains that of adequate staffing.

**2. Please describe briefly the team involved in your Section 508 procurement process, and the roles and responsibilities of team members, especially if they have changed since you submitted your plan. If you have had trouble identifying team members, please explain why and include your suggestions of solutions at the campus or Chancellor's Office (CO) level.**

<p>2a. Accomplishments in 2007/2008</p>	<p>The campus formed an E&amp;IT Procurement Team that was chaired by our Director of Procurement and Contracts. The membership of the team consisted of individuals who were responsible for the oversight of the following:</p> <ul style="list-style-type: none"> <li>• ATI E&amp;IT Procurement Policies and Procedures</li> <li>• ATI Procurement Web Site and Support</li> <li>• Reviewers and approvers of E&amp;IT procurement forms and VPATs</li> <li>• Reviewers of the exemption requests</li> <li>• Enforcers of the campus ATI E&amp;IT policies and Section 508 procurement policies</li> </ul> <p>The members of the committee consisted of the following:</p> <ul style="list-style-type: none"> <li>• Director of Purchasing responsible for the oversight of the ATI Procurement Procedures and Policies</li> <li>• ATI Specialist from the ITS Desktop Services Group responsible for the ATI Procurement Web Site and for providing consulting support</li> <li>• Director of ITCs from Academic Affairs responsible for end user technical support</li> <li>• Representatives from ITS responsible for the review and approval of the E&amp;IT procurement approval forms and VPAT submissions</li> <li>• Purchasing agents responsible for enforcing the ATI E&amp;IT policies</li> <li>• Coordinator of the overall campus ATI</li> <li>• Technical and administrative representatives from Student Services and Administration and Finance</li> <li>• Faculty member appointed by the Academic Senate</li> </ul> <p>The individual members did change due to employment separations</p>
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	and promotions; however new individuals assuming vacant positions joined the team. There were no changes to the roles and responsibility of team members.
2b. Plans for 2008/2009	<p>The ATI E&amp;IT Committee is in the process of developing a training program for the campus community. Training will occur at the end of August and during the month of September.</p> <p>The committee will continue to meet throughout 2008/2009 to work on problems and issues that arise, and prepare for the next procurement threshold.</p>
2c. Barriers to completion	<p>It has been a struggle to get this far. The additional duties required for ATI have been subsumed within the already maxed work assignments of many individuals. We had ambitious plans to lower the threshold prior to September but were unable to due to other deadlines and projects.</p> <p>The \$50,000 threshold yielded a small number of cases to test and the majority of those we did get were at the very end of the fiscal year when the process was rushed due to impending deadlines. The lowering of the threshold to \$15,000 will yield more cases to test our process.</p>
2d. Observations/discoveries	It is anticipated that the \$15,000 threshold will generate more cases. This should help populate our VPAT library and actually improve our response on Section 508 requisitions. Campuses would be able to function at a higher level for a lower cost per campus if and when the CO establishes a central repository.
<b>3. Please list the other significant roles of individuals involved in the Section 508 procurement process. Please briefly list the Section 508 procurement responsibilities of each.</b>	
3a. Accomplishments in 2007/2008	Several buyers have been involved in the process of ensuring that the requisition packages are in compliance with Section 508 requirements. In ITS, several technicians have been assigned to work on VPAT and similar issues including walking vendors through the process.
3b. Plans for 2008/2009	Plans for this year are to continue the processes developed and provide more training in both procurement and ITS as the processes evolve.

3c. Barriers to completion	More personnel would be extremely helpful and would allow processes to develop at a much greater pace.
3d. Observations/discoveries	The buyers and ITS people understand the process. The issues have been in dealing with the campus community and with suppliers unfamiliar with the requirements of Section 508.
<b>4. How many procurements over \$50,000 were made on the campus? Were you able to incorporate Section 508 requirements in all of them? If not, why not?</b>	
4a. Accomplishments in 2007/2008	123 procurements over \$50,000 were made in the fiscal year. Most of the procurements over \$50K were for construction and non-Section 508 compliance items. There were eighteen procurements requiring Section 508 requirements. There were several in the July/August timeframe that did not have Section 508 compliance. At that time, CSULA did not have a process in place.
4b. Plans for 2008/2009	With the reduction to the \$15,000 threshold, it is anticipated that the number of requisitions requiring Section 508 compliance will triple. It is hoped that the VPAT library will help reduce the workload and make the increase in requisitions manageable.
4c. Barriers to completion	The major barrier to completion is the timely receipt of correct and completed VPATs from suppliers. Many of the suppliers contacted in 2007/2008 were unaware of the requirement or were unable to quickly provide an accurate VPAT.
4d. Observations/discoveries	The use of Section 508 compliance procedures created a great deal of confusion for the purchase of scientific products. For example, many scientific products include an embedded personal computer that puts them into the ATI compliance category. Since they are not the manufacturer of the computer, the suppliers are confused by the VPAT requirement and are not able to respond without consulting the source of the computer, thus creating a long time delay.
<b>5. Of the procurements that did incorporate Section 508 requirements, how many resulted in an exception from the Section 508 requirements? Which exceptions have been used? Please provide an example or two, if you have any.</b>	
5a. Accomplishments in 2007/2008	At the end of the year, the campus was furnishing a science building, thus necessitating the purchase of considerable scientific equipment. Some of this equipment had computer interfaces requiring Section 508 compliance. Since most of these purchases were of sole source items, exceptions were given. There were several for back office

	including one for the phone system.
5b. Plans for 2008/2009	In 2008/2009, the sole source exception should be quite rare, although the use of software may generate additional sole source requirements.
5c. Barriers to completion	Lack of staff remains an issue as well as funding shortages. Many of the non-computer vendors are unfamiliar with Section 508 requirements.
5d. Observations/discoveries	Suppliers have been very cooperative, but have been limited by their inexperience and lack of resources.
<b>6. If there were exceptions, how many included a procedure to provide equally effective alternative access? Please attach one as an example.</b>	
6a. Accomplishments in 2007/2008	None provided alternatives.
6b. Plans for 2008/2009	Plans are to add requesting alternatives as part of the procedure. Part of the due diligence will be challenging the department.
6c. Barriers to completion	A major constraint is the time involved in challenging a department's selection. This requires additional time from the department, from ITS, and from Procurement. This time is a scarce commodity and does not exist at year end.
6d. Observations/discoveries	Most departments are very limited in what they want to procure and show little flexibility.
<b>7. What Section 508 procurement communication activities took place during the past year? Please describe the activities and attach any relevant documents or materials.</b>	
7a. Accomplishments in 2007/2008	There were four major communication activities for the year. 1) The Procurement Group met periodically to work on various issues related to Section 508; 2) activities were communicated to the Section 508 Steering Committee; 3) the campus group communicated with the CO via a day-long seminar and scheduled phone meetings; and 4) the provisions of the Procurement Group were communicated to the campus' Financial Officers. The campus also participated in minor events such as a Webinar for VPATS.
7b. Plans for 2008/2009	For the upcoming year, the plans are to continue the above mentioned communications practices. In addition, the plans are to do

	a general training of campus end users and a more detailed, technical training of the campus ITCs.
7c. Barriers to completion	Large quantities of time are required to prepare, organize, and present trainings. There is also a difficulty in getting full attendance.
7d. Observations/discoveries	Communication is critical to the process, but it is a very heavy consumer of time, a commodity of which the campus has little extra.
<b>8. What Section 508 procurement communication activities took place during the past year? How many people were trained? What roles were they in? Please describe the activities and attach any relevant documents or materials.</b>	
8a. Accomplishments in 2007/2008	No formal training activities occurred on the campus in 2007/2008. Off campus, many of those involved in E&IT procurement attended the CO trainings.
8b. Plans for 2008/2009	Trainings for both ITS personnel and campus end-users (including Divisional Managers) are being prepared for presentations in August or September. Additional trainings may be performed on an as needed basis.
8c. Barriers to completion	Time and attendance issues will impact trainings. Also, the volume of requirements may have an impact. If there are few requirements, much of the training may be ineffective because the trained person does not have an opportunity to use the training.
8d. Observations/discoveries	The trainings have proven difficult to incorporate into our campus due to the constantly changing nature of ATI in the early stages.
<b>9. What activities took place to evaluate the implementation of Section 508? Please describe. What were the results?</b>	
9a. Accomplishments in 2007/2008	Requisitions with Section 508 compliance requirements were rare; the volume was marginal--too low to measure effectiveness of processes.
9b. Plans for 2008/2009	It is expected that the drop to \$15,000 will result in many more Section 508 requirements, thus providing CSULA with a meaningful measurement of the processes.
9c. Barriers to completion	A reduction in dollars spent on campus might impact the number of requisitions issued.

9d. Observations/discoveries	The campus' VPAT Library also requires testing and the increased volume in requirements should provide ample data.
<b>10. In what ways did implementation of your Section 508 Procurement Plan differ from what had been planned? Why?</b>	
10a. Accomplishments in 2007/2008	The plan had been for there to be opportunities to hone the procedure and processes through a gradual release of requisitions in excess of \$50,000 requiring Section 508 compliance. In reality, there were no requirements over \$50,000 until May/June 2008; then there was a spate of them that did not allow the team the time to work them and revise the processes in accordance with reality.
10b. Plans for 2008/2009	The plan to reduce the threshold to \$15,000 will provide the team with a much larger number of requisitions requiring compliance. The new threshold should allow the team to accomplish a tightening of processes and an updated procedure.
10c. Barriers to completion	The barriers to completion have been the low number of qualifying orders. With the impending budget reduction, it is possible that a reduction in buying could impact process and procedure revision.
10d. Observations/discoveries	The campus foresees an unintentional standardizing of IT equipment as end-users select products with VPATS in the Library over those items that require the end-user to acquire the VPAT from the supplier.
<b>11. What additional resources would assist your campus in implementing Section 508 procurement objectives?</b>	
Additional financial resources would be very welcome along with professional training. A centrally located (CO located) VPAT Repository and testing facility would also provide relief for the campus' overtaxed resources.	