The California State University
OFFICE OF THE CHANCELLOR

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June 16, 2020

Dr. Judy K. Sakaki, President
Sonoma State University
1801 East Cotati Avenue
Rohnert Park, CA 94928

Dear Dr. Sakaki:

Subject: Audit Report 20-86, *Accessible Technology*, Sonoma State University

We have completed an audit of *Accessible Technology* as part of our 2020 Audit Plan, and the final report is attached for your reference. The audit was conducted in accordance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*.

I have reviewed the management response and have concluded that it appropriately addresses our recommendations. The management response has been incorporated into the final audit report, which has been posted to Audit and Advisory Services' website. We will follow-up on the implementation of corrective actions outlined in the response and determine whether additional action is required.

Any observations not included in this report were discussed with your staff at the informal exit conference and may be subject to follow-up.

I wish to express my appreciation for the cooperation extended by the campus personnel over the course of this review.

Sincerely,

Larry Mandel
Vice Chancellor and Chief Audit Officer

c: Timothy P. White, Chancellor

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ACCESSIBLE TECHNOLOGY

Sonoma State University

Audit Report 20-86
May 11, 2020

EXECUTIVE SUMMARY

OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of operational and administrative controls related to the California State University (CSU) Accessible Technology Initiative (ATI) and to ensure compliance with relevant federal and state regulations; Trustee policy; Office of the Chancellor (CO) directives; and campus procedures. The CSU ATI provides guidelines for compliance with regulations related to the implementation and monitoring of this federal statute.

CONCLUSION

Based upon the results of the work performed within the scope of the audit, except for the weaknesses described below, the operational and administrative controls for ATI as of February 27, 2020, taken as a whole, provided reasonable assurance that risks were being managed and objectives were met.

Sonoma State University (SSU) had established a governance and organizational structure to ensure that departments complied with CSU ATI policies and procedures. The ATI executive sponsor and steering committee provided oversight of the instructional materials, procurement, and website accessibility that focus-area teams used to implement ATI practices across campus. However, we identified areas for improvement, such as ensuring that the learning management system (LMS) was accessible and that website accessibility compliance was achieved. Additionally, the campus could improve prioritization to ensure that accessibility indicators that did not reach the CSU baseline standards were timely addressed.

Specific observations, recommendations, and management responses are detailed in the remainder of this report.

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. INSTRUCTIONAL MATERIAL DOCUMENT ACCESSIBILITY

OBSERVATION

The campus did not have a process to ensure that documents were made accessible before being uploaded into the LMS.

We found that documents were not consistently checked for accessibility and that faculty was not always being trained to create accessible documents. The campus was implementing software to help determine whether instructional materials in the LMS were accessible but had not developed monitoring procedures to ensure that accessibility of documents was improving.

Implementing processes to evaluate whether documents are accessible before they are uploaded into the LMS and monitoring ongoing compliance helps to ensure that the campus is consistently providing instructional materials that are compliant with accessibility standards.

RECOMMENDATION

We recommend that the campus create and implement a process to ensure that documents are made accessible before being uploaded into the LMS and implement monitoring procedures to help ensure that the LMS documents remain compliant.

MANAGEMENT RESPONSE

We concur. The campus will create and implement a process to ensure that documents are made accessible before being uploaded into the LMS. We will also implement monitoring procedures to help ensure that the LMS documents remain compliant.

Expected completion date: October 31, 2020

2. WEBSITE ACCESSIBILITY COMPLIANCE

OBSERVATION

Websites managed by auxiliary and grant programs had not implemented procedures to ensure compliance with ATI requirements.

We found that websites managed by the campus had implemented procedures to help ensure accessibility compliance, but the web development areas not under the purview of the campus had not implemented procedures to help ensure compliance.

RECOMMENDATION

We recommend that the campus implement procedures to ensure that websites managed by auxiliary and grant programs comply with ATI requirements.

MANAGEMENT RESPONSE

We concur. The campus will implement procedures to ensure that websites managed by auxiliary and grant programs comply with ATI requirements.

Expected completion date: October 31, 2020

3. WEBSITE ACCESSIBILITY REVIEW PROCESS

OBSERVATION

The campus did not have a sufficient quality assurance process to ensure that code developed by third parties met campus accessibility standards before being accepted by the campus, and the process did not ensure that the current version of Web Content Accessibility Guidelines (WCAG) standards were being followed.

RECOMMENDATION

We recommend that the campus:

a. Update their process to ensure that code developed by third parties meets accessibility standards before being accepted and implemented on campus websites.

b. Ensure that the process is updated to meet current WCAG standards.

MANAGEMENT RESPONSE

We concur. The campus will update our process to ensure that code developed by third parties meets accessibility standards before being accepted and implemented on campus websites. We will also ensure that the process is updated to meet current WCAG standards.

Expected completion date: October 31, 2020

4. SOFTWARE PROCUREMENT RISK ACCEPTANCE

OBSERVATION

The campus software procurement process allowed purchase requestors to buy noncompliant software by agreeing to an Equally Effective Alternate Access Plan (EEAAP) and did not require management approval for the purchase of noncompliant software.

Under the existing process, if a Voluntary Product Accessibility Template was unavailable from the software vendor when creating a purchase request, an EEAAP could be created and signed by the purchase requester accepting the risk of noncompliance without the need of management review.

RECOMMENDATION

We recommend that the campus update its software procurement process to ensure that management approval is required for purchases of noncompliant software.

MANAGEMENT RESPONSE

We concur. The campus will update its software procurement process to ensure that management approval is required for purchases of noncompliant software.

Expected completion date: October 31, 2020

5. STATUS INDICATORS BELOW BASELINE

OBSERVATION

Certain ATI planning success indicators for procurement, web development, and instructional materials were below the established CSU baseline and were not elevated to a top priority within the campus prioritization matrix.

The CSU has established success indicators to ensure that ATI goals for the campuses are timely reached. The CSU has reiterated the need to have all indicators reach a minimum baseline accessibility level and stated that success indicators that fall below the baseline should be a top priority for the campus to ensure that the minimum accessibility baselines are met.

RECOMMENDATION

We recommend that the campus prioritize status indicators that are below the required baseline to ensure that they are timely addressed.

MANAGEMENT RESPONSE

We concur. The campus will prioritize status indicators that are below the required baseline to ensure that they are timely addressed.

Expected completion date: October 31, 2020

GENERAL INFORMATION

BACKGROUND

In August 1998, President Bill Clinton signed into law the Rehabilitation Act Amendments of 1998. Among other things, the law requires federally funded programs and services to provide people with disabilities access to electronic and information technology. It also strengthened Section 508 of the Rehabilitation Act, which was enacted to eliminate barriers in information technology, make new opportunities available for people with disabilities, and encourage development of technologies that will help achieve these goals. The law applies to all federal agencies, which must ensure that any electronic and information technology that is developed, procured, maintained, or used is accessible to employees and members of the public with disabilities. Section 508 also describes various means for disseminating information, including computers, software, and electronic office equipment. It applies to, but is not solely focused on, federal web pages on the Internet. The law does not apply to private industry or state and local government, but those entities must comply with the law if they are receiving federal funds or under contract with a federal agency. Government Code §11135 requires the CSU and other state governmental entities to comply with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended.

In 2004, the CSU implemented Executive Order 926, *Policy on Disability Support and Accommodations*, to make information technology resources and services accessible to all CSU students, faculty, and staff, as well as the general public. Concurrently, the CSU developed the Center for Accessible Media to help expedite the delivery of electronic instructional texts to eligible CSU students with disabilities. In January 2006, the CSU launched its ATI in order to develop the work plan, guidance, and resources to assist campuses in carrying out the accessible technology (AT) provisions of its revised *Policy on Disability Support and Accommodations*. CSU ATI plans are continuously developing and were revised and extended through policy every year from 2007 to 2014 based on experiences reported by the campuses and the understanding that ATI requirements and milestones should be flexible, allowing campuses to follow different plans for accomplishing them. It is anticipated that the ATI will continue to evolve as new needs are identified.

In January 2013, the CSU issued Coded memorandum Academic Affairs (AA) 2013-3, *Accessible Technology Initiative*, to provide campuses with guidance for implementing AT. The memorandum establishes responsibilities and outlines overall governance, specified project planning, and established implementation timelines.

In December 2015, the CSU amended AA-2013-03 by issuing AA-2015-22 to enhance the guidance by outlining specific systemwide activities and responsibilities of the CO ATI department, and enhancing the reporting requirements to include annual reporting to both the CO ATI department and the campus President.

In May 2018, the CSU issued Executive Order 1111, which supersedes the original ADA EO 926.

At SSU, the responsibility for establishing and maintaining an effective ATI program resides with the executive sponsors of the steering committee. The steering committee consists of members from key stakeholder groups across the campus, including the chief information officer, Faculty Affairs, academic senate representative, Faculty Center, Disability Services for

Students, and Americans with Disabilities Act (ADA) compliance. The steering committee compiles and submits an annual report to the CO on the status indicator levels for Sonoma State University's ATI plan.

SCOPE

We visited the SSU campus from February 3, 2020, through February 27, 2020. Our audit and evaluation included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. The audit focused on procedures in effect from January 1, 2019, through February 3, 2020.

Specifically, we reviewed and tested:

• Monitoring of the quality and effectiveness of campus ATI program services.

• Resolution of complaints and grievances relating to program accessibility.

• Qualifications of services to students with disabilities staff and campuswide training practices.

• Provision of reasonable technology access and accommodations to applicants and employees.

• Provision of programs, services, and activities that are readily accessible to disabled individuals.

• Ongoing updates and monitoring of the ATI implementation plan.

• Prioritization of ATI implementation tasks and plans.

• Development, documentation, and communication of equally effective alternative access.

• Adequacy of ATI training.

• Compliance with the accessible electronic and information technology procurement program.

The ADA is broad in its scope, but we focused on compliance with Section 508, which the CSU refers to as ATI. The scope included both student and employee accessibility.   Specific areas reviewed included overall governance and responsibility for implementing the initiative, as well as review of the three key components of ATI: website accessibility, procurement, and instructional materials. Our review included compliance with Trustee policy, federal and state directives, and campus policies and procedures; technological compliance; procedures for handling complaints; communication; and employee training.

As a result of changing conditions and the degree of compliance with procedures, the effectiveness of controls changes over time. Specific limitations that may hinder the effectiveness of an otherwise adequate system of controls include, but are not limited to, resource constraints, faulty judgments, unintentional errors, circumvention by collusion, and management overrides. Establishing controls that would prevent all these limitations would not be cost-effective; moreover, an audit may not always detect these limitations.

Our testing and methodology, which was designed to provide a review of key operational and administrative controls, included interviews, walkthroughs, and detailed testing on certain

aspects of the ATI program. The review was limited to gaining reasonable assurance that essential elements of the HS program were in place and did not examine all aspects of the program.

CRITERIA

Our audit was based upon standards as set forth in federal and state regulations and guidance; Trustee policy; Office of the Chancellor directives; and campus procedures; as well as sound administrative practices and consideration of the potential impact of significant risks. This audit was conducted in conformance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*.

This review emphasized, but was not limited to, compliance with:

- EO 1111, *The California State University Board of Trustees Policy on Disability Support and Accommodations*
- AA-2015-22, *Accessible Technology Initiative: Amendment to AA-2013-03*
- AA-2013-03, *Accessible Technology Initiative*
- AA 2014-08, *Provision of Accommodation and Support Service to Students with Disabilities*
- SSU *Instructional Materials Adoption Policy 2013-2*
- SSU *Syllabus Policy 2006-2*
- SSU *Web Policy 2000-6*
- SSU *Disability Access for Students Policy 2005-2*

AUDIT TEAM

IT Audit Manager: Greg Dove
IT Auditor: Christopher Burk