CAL POLY

Electronic and Information Technology (E&IT)

Procurement Implementation Plan

California Polytechnic State University

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Introduction

On March 29, 2007 President Baker issued a notice to the campus community reiterating Cal Poly's commitment to provide equal access by everyone to Cal Poly's electronic and information technology resources and services. This includes meeting the goals of The California State University Accessible Technology Initiative (ATI) in three areas: Web Accessibility, Instructional Materials, and Electronic and Information Technology (E&IT) Procurement. California Government Code Section 11135 and CSU Executive Order 926 require the CSU and its campuses to purchase E&IT products and services that conform to the requirements of Section 508 of the Rehabilitation Act of 1973, as amended.

The technical standards of Section 508 provide criteria specific to E&IT acquisition. E&IT includes information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information. The term E&IT includes, but is not limited to, computers, software, telecommunications products (such as telephones), information kiosks and transaction machines, World Wide Web sites, multimedia, and office equipment such as copiers and fax machines. The term does not include any equipment that contains embedded information technology that is used as an integral part of the product, but the principal function of which is not the acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. For example, HVAC (heating, ventilation, and air conditioning) equipment such as thermostats or temperature control devices, sensors/alarms, medical equipment, and similar types of equipment where information technology is integral to its operation are not considered to be E&IT products that fall under Section 508 requirements.

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

The requirements of applicable laws and regulations for the acquisition of goods and services by the CSU are defined within the CSU Policy Manual for Contracting and Procurement. The implementation of these requirements and policies, where applicable, are defined by campus specific policies and procedures. These policies and procedures are being updated to include the requirements for the acquisition of E&IT products.

The following core Section 508 procurement functions are expected to be followed for E&IT acquisitions unless an approved exemption has been granted:

1. Identify the functional requirements for using a product;
2. Conduct market research to determine the availability of a product to meet the functional requirements;
3. Evaluate products to determine the degree of compliance with Section 508 requirements and to identify the product that meets these requirements;
4. Verify Section 508 actions and authorize exemptions, if any;
5. Request vendors to submit Section 508 compliance documentation, e.g., a completed VPAT, vendor checklist, or other forms as specified by Cal Poly or CSU, as needed; and
6. Document Section 508 accessibility evaluations and decisions.

Formal Competitive Procurements:

E&IT procurements subject to formal competition requirements will require the User/Requestor, with assistance from the College/Department LAN Coordinator or ITS Technical Consultant(s) and the E&IT Campus Compliance Officer, when necessary, to conduct market research with regard to the commercial availability of accessible products. This information will be used to develop formal solicitation documents, which will include requiring the Vendor to submit Section 508 compliance documentation.

The User/Requestor and the E&IT Campus Compliance Officer, with assistance from the Buyer, will determine the information that vendors will be required to submit to document the degree of compliance with Section 508 requirements and the criteria and its relative weighting that will be used to evaluate the documents submitted. 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 will be evaluated as well. The CSU 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:

These E&IT procurements require the User/Requestor to perform market research with assistance, as needed, from the College/Department LAN Coordinator or ITS Technical Consultant(s) and the E&IT Campus Compliance Officer. Once conforming E&IT products have been identified or an exemption has been approved, the User/Requestor will submit the Section 508 documentation along with a Purchase Requisition to the Buyer to complete the purchase in accordance with applicable procurement policies and procedures.

Purchase Decision:

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

1. All products meet the functional requirements and meet all the applicable 508 standards: The Buyer may purchase any of the products evaluated in accordance with applicable procurement policies and procedures.
2. The products evaluated meet Section 508 requirements to varying degrees: The Buyer must purchase the product in accordance with the applicable policies contained in the CSU Policy Manual for Contracting and Procurement and campus procurement policies and procedures.
3. Product previously purchased and is still conformant: The 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.
4. Approved Exemption: The product falls within one of the approved exemptions as determined by the E&IT Campus Compliance Officer. The Buyer may purchase the product in accordance with applicable procurement policies and procedures.

<u>Approved Exemptions:</u>

Net Cost Increase:

The CSU has a specific exemption base in California's Government Code Section 11135(c)(2). This Government Code section states: "... In clarifying that the California State University is subject to paragraph (2) of subdivision (d), it is not the intention of the Legislature to increase the cost of developing or procuring electronic and information technology. The California State University shall, however, in determining the cost of developing or procuring electronic or information technology, consider whether technology that meets the standards applicable pursuant to paragraph (2) of subdivision (d) will reduce the long-term cost incurred by the California State University in providing access or accommodations to future users of this technology who are persons with disabilities, as required by existing law, including this section, Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12101 and following), and Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. Sec. 794). "

This section of the Government Code exempts the CSU from Section 508 requirements if it can be determined that the procurement of accessible E&IT product will increase the cost to the CSU. Procurement policies and procedures incorporating Section 508 requirements, including the Section 11135 (c) (2) exemption, are in the process of development and are not yet finalized.

1. Research: Conduct cost analysis to determine the net cost to the organization in procuring a product that conforms to Section 508 standards.
2. Evaluation: Evaluation of the cost analysis must include the long-term reduction in cost incurred by the CSU in providing access or accommodations to future users of this technology who are persons with disabilities.
3. Documentation: Cost analysis and supporting documentation.
4. Verification: Cost analysis should also be reviewed by other appropriate departments with insight to the cost elements contained within the cost analysis, e.g., Information Technology Services, Disability Resource Center, etc.
5. Determination: User/Requestor, VP/CIO, LAN Coordinator, ITS Technical Consultant(s), Buyer, and the E&IT Campus Compliance Officer will jointly determine that the proof of an increase of expense to the CSU is justifiable and supportable.

Commercial Non-availability

When acquiring E&IT products or services, campuses are only required to comply with those standards that can be met with E&IT products that are available in the commercial marketplace in time to meet delivery requirements. Campuses need not acquire a non-commercial item in these cases solely to satisfy 508 standards. Commercial non-availability must be addressed on an individual standard basis, and campuses cannot claim a commercial product as a whole is non-available just because it does not meet all the applicable standards. In such cases campuses shall follow applicable procurement policies and procedures to purchase the product that best meets 508 standards and functional requirements or best value criteria.

1. Research: Conduct market research and product evaluation.

2. Evaluation: Review the viability of using alternative accessible products.
3. Documentation: Maintain documentation of products evaluated.
4. Verification: User/Requestor should review market research with LAN Coordinator and confer with ITS Technical Consultant(s) if necessary.
5. Determination: User/Requestor and E&IT Campus Compliance Officer review documentation.

Sole Brand

A sole brand is when only one product meets the functional specification required. A sole brand product should first be reviewed and approved in accordance with campus policy and procedure for sole brand requests. An approved sole brand product is exempt from Section 508 requirements.

1. Research: Conduct market research and product evaluation.
2. Evaluation: Review the viability of using alternative accessible products.
3. Documentation: Maintain documentation of products evaluated.

Back Office

This pertains to a group of products that reside in a back office, such as a telecommunication closet or data center. The products do not interact with people except when maintenance is required. An example is a server in a data center. If the server simply operates without human interaction, then the server qualifies as a back office exemption. If there is software running on the server that does have human interaction (e.g., Oracle), then the software is not exempt as a back office exemption.

1. Research: Determine location and function of product.
2. Evaluation: Review possibility of interaction of product by Cal Poly personnel.
3. Documentation: Product functional requirements/specifications.
4. Verification: User/Requestor, LAN Coordinator and/or ITS Technical Consultant(s)
5. Determination: User/Requestor and E&IT Campus Compliance Officer review documentation.

Fundamental Alteration

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

Undue Burden

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

Other Exemptions

In addition to the exemptions above, Section 508 provides for other types of exemptions that may be granted. Requests for exemption will be reviewed on a case-by-case basis and will be approved by the E&IT Campus Compliance Officer.

Component 2: Process for determining Undue Burden and Fundamental Alteration

Sections 508 defines undue burden as a product that causes "significant difficulty or expense" to the organization.

Process for Determining Undue Burden

When determining if a product qualifies for an undue burden, the campus must consider the resources available to the program or component for which the product is being developed, procured, maintained, or used. Considerations should include the functionality needed from the product and the technical difficulty involved in making the product accessible. In addition, other considerations include compatibility and the difficulty of integrating the product with the campus or CSU infrastructure, including security.

When an E&IT product or service qualifies as a potential undue burden, the User/Requestor's department, in coordination with Contracts and Procurement Services (C&PS), must submit a request along with the Purchase Requisition documentation to the Vice Provost/Chief Information Officer (VP/CIO) or designee and E&IT Campus Compliance Officer for review and recommendation. The components of an Undue Burden request include:

1. Description of the product and its function;
2. Description of the undue burden, specifically;
3. Applicable technical provisions of the Section 508 standards;
4. Specific provisions that cannot be met as a result of undue burden;
5. All funds available from potential funding sources, including the program, department or component for which the product or service is being acquired;
6. Estimated cost of acquiring a product that meets the applicable technical provisions along with an explanation of how costs were estimated;
7. Market research performed to locate items that meet the applicable technical provisions;
8. Proposed method of providing alternative access and its estimated cost;
9. Time schedule on when it will no longer be an undue burden to the organization; i.e. product will be conformant; and
10. Resubmission of undue burden request every two years until the product is conformant.

The VP/CIO and E&IT Campus Compliance Officer will forward the undue burden request, along with their recommendation, to the President or the President's designee. The President or designee will have the final authority to approve or disapprove the undue burden request. Cal Poly's President has designated the Provost/Vice President for Academic Affairs to perform this function.

A copy of the final determination of the undue burden request shall be retained by the E&IT Campus Compliance Officer and also be included in the procurement file. The E&IT Campus Compliance Officer shall make these records available upon request.

If an undue burden is approved, it is important to note that by statutory obligations, the CSU must provide alternative access. The requesting department is responsible for providing such access.

Process for Determining Fundamental Alteration

Cal Poly 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 hand-held devices. Adding a larger display to a hand-held

device 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. However, technology in this area is rapidly evolving and an exemption granted for one procurement effort should not be automatically extended to future procurements. Many hand-held devices that were once exempt due to non-accessibility features are now accessible. As a result, the User/Requestor and E&IT Campus Compliance Officer must be cognizant of the technology in this field to ensure that the exemption is valid.

The determination of fundamental alterations includes the following steps:

1. Research: Determine the functional requirements and the specific need for the E&IT product.
2. Evaluation: Review the accessibility of the product and the impact of the accessible product to the functional requirements.
3. Documentation: Vendor product documentation.
4. Verification: User/Requestor with assistance from their LAN Coordinator.
5. Determination: ITS Technical Consultant(s) and E&IT Campus Compliance Officer review documentation.

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

When E&IT acquisitions are approved for exception or are not yet subject to the E&IT accessible procurement process, the User/Requestor is responsible for notifying the E&IT Campus Compliance Officer that such a product was procured. The E&IT Campus Compliance Officer and User/Requestor in consultation with designated campus offices will assess the potential impact on students, employees, and members of the public and plan for alternate access methods for persons who require such access. For example, departments using online surveys must provide information on who to contact for assistance if the survey cannot be completed using assistive technologies.

For every exempted acquisition that is not for one person's use, the User/Requestor must document the process for providing access to individuals with disabilities. The User/Requestor and their department (if necessary) will work with the E&IT Campus Compliance Officer and the offices responsible for providing accommodations to define specific procedures for providing alternative access, a plan to communicate the accommodations to affected individuals, and a feedback mechanism to evaluate the effectiveness of the solution(s).

Existing campus policies and practices for accommodating individuals with disabilities, including procedures for handling complaints, will be followed. Student requests for accommodations are handled through the Disability Resource Center. Complaints from students are referred to the Dean of Students in accordance with "The Policy and Procedures for Resolving University 504/ADA

Student Accommodation Disputes." Staff and faculty requests for accommodation and complaints are processed through Employment Equity and Faculty Recruitment. These offices work with the appropriate campus offices, individuals and departments to provide specific accommodations. Responsibility for providing alternative access to E&IT products and services will rest with the individual and/or department providing the inaccessible technology, after consultation with the E&IT Campus Compliance Officer and the offices responsible for accommodations.

Procedures for handling accommodation requests and complaints from the general public are being defined. However, by policy, administrative Web sites and official emails must include the minimum information necessary for anyone to contact the department for assistance. For example, Cal Poly's online recruitment online application (http://www.calpolyjobs.org) and related campus website (http://www.afd.calpoly.edu/hr/employment/index.html) directs individuals with disabilities or limited computer access to contact Human Resources for assistance with the application process.

The Campus Section 504/ADA Title II Coordinator (a function assigned to Employment Equity and Faculty Recruitment) addresses inquiries regarding application of related laws, refers inquiries to designated campus offices, clarifies existing processes and roles and responsibilities, and ensures individuals with disabilities are aware of and receive appropriate due process in accordance with applicable laws, regulations and policies as they pertain to Cal Poly programs and activities.

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 campus community about the ATI and how it affects departments and individuals responsible for initiating E&IT purchases. Cal Poly anticipates using a staged approach and a variety of methods to communicate to the campus about ATI in general and to affected individuals about the procurement plan specifically. These include:

1. Expanding the existing campus accessibility website to include links to the procurement plan and related policies, practices and resources.
2. Distributing information via online publications, such as the weekly employee newsletter, Cal Poly Report, and the Campus Announcements channel on the MyCalPoly portal.
3. Distributing broadcast messages via email to all employees to inform them of implementation plans and related policies and practices, and to provide links to websites for more information.
4. Conducting regular open forums and/or other venues (e.g., town hall meetings, focus groups, etc.) to share information and answer questions about related plans, policies and practices. This would include inviting departments who have gone through the Section 508 procurement process to share what they learned and experienced. The primary audience would be managers and administrative support staff. However, technical support staff and faculty may also attend.
5. Distributing targeted mailings and reminder notices to individuals most impacted by each phase of the implementation plan. Such mailings might include links to more information, invitations to attend open forums for sharing information and answering questions, etc.
6. Using frequently-asked-questions to capture and respond to commonly asked questions.

7. Conducting training in the areas of most interest and confusion based on feedback from users.

In March 2007, Cal Poly implemented a new "Policy on Decisions to Acquire or Develop Software Applications and Services" and related standards and practices. The Software Decision Process requires the User/Requestor to complete a checklist for any software acquisition exceeding $5,000. The checklist requires software to be evaluated for ADA compliance and vendors are being asked to submit a completed VPAT to the E&IT Campus Compliance Officer for review and approval before the purchase is made. Prior to announcing the new practice at an open forum, Contracts and Procurement Services and Information Technology Services piloted the checklist with individuals who were in the process of acquiring software. Based on feedback from those users, the process was modified. A similar process will be employed as new elements of the plan are implemented.

Training Plan

Training is the methodology to explain to or educate all individuals involved with the Section 508 procurement process. This plan assumes the CSU Chancellor's Office will provide some initial training for the E&IT Campus Compliance Officer and C&PS Buyers to help them better understand Section 508 and how it impacts procurement, their roles and responsibilities, available resources and support sources, interpreting the VPAT and understanding exemptions.

Initially, training related to each implementation will be accomplished primarily through individual consultation on specific procurements. In addition, ATI in general and the procurement plan specifically will be discussed in a wide variety of constituent group forums, starting with the Executive Management Staff, Academic Deans Council, Instructional Department Heads Council, Academic Senate, College and Division Managers, Local Area Network Coordinators, Campus Computing Advisory Committees, and, via Open Forums, to Administrative Support Staff. This training will focus on the project overview, implementation schedule, campus processes and resources, and the roles and responsibilities of management and offices in the process.

ITS and C&PS will coordinate regular presentations and dissemination of information to faculty and staff who initiate purchases. This training will focus on understanding the roles and responsibilities of the User/Requestor, available resources and support services, forms, checklists and procedures, market research and evaluating vendor checklists, and addressing their specific issues and concerns. Online documentation and self-service documentation will be used as much as possible so as to minimize the impact on existing staff. The need to develop a formal training plan will be reviewed.

ITS will work through the LAN Coordinators listserv and meetings to help college and department LAN Coordinators and ITS Technical Consultant(s) understand their roles and responsibilities in the process, market research, evaluating products for conformance with 508 technical standards, etc. Initially, ITS employees will be more heavily involved in the technical evaluation process in order to adequately train the LAN Coordinators on the standards. In addition, Cal Poly is looking to the CSU Chancellor's Office to provide links to available resources, support for product testing and evaluation as well as a clearinghouse (database) of compliant products.

ITS and C&PS will work with vendors as the need arises to help them understand Section 508 standards, adherence to Cal Poly and CSU requirements, and their roles and responsibilities in the process, including completion of the VPAT.

Detailed training plans and schedules will be developed as needed based on campus timelines.

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

The goal is to have E&IT acquisition requests comply with Section 508 requirements consistent with the timelines outlined in this plan. This goal will be pursued by enforcing, facilitating and/or supporting the process outlined in Component 1, above. There are four components:

1. Market Research: Verified by proper Section 508 documentation
2. Vendor provided information and conformance of the product: Verified by the User/Requestor's signature on the E&IT Procurement form (to be developed). For large-scale purchases, verification will also come from the completed testing protocol signed by one charged with conducting conformance testing of the product, i.e., LAN Coordinator, ITS Technical Consultant, E&IT Campus Compliance Officer, CSU Testing Center, etc.
3. Documentation, Review and Exemptions: Verified by E&IT Campus Compliance Officer's initials on the E&IT Procurement form (TBD) and/or E&IT Campus Compliance Officer's files.
4. E&IT products purchased as outlined by the Section 508 law: Verified through internal review processes, to be defined.

Evaluation Methodology

Cal Poly will self-check by randomly selecting and reviewing a sample of E&IT acquisitions twice a year for the first two years; thereafter, it is expected that compliance will be validated through routine annual internal review and audit processes. The review will verify that the proper Section 508 documentation has been completed and included in the procurement files. The E&IT Campus Compliance Officer will retain copies of Section 508 documentation reviewed, e.g., VPAT, and possibly a spreadsheet that will indicate the status of each review, and report at least annually on actions taken, including exemptions granted. Initially, this process will be applied to formal E&IT acquisitions; the evaluation process for informal acquisitions will be defined as those phases are implemented. This evaluation measures four criteria:

1. User/Requestor has conducted market research and evaluated the E&IT product for Section 508 standards conformance
2. E&IT Campus Compliance Officer is properly documenting reviews and exemptions
3. E&IT acquisition requests have proper Section 508 documentation
4. E&IT products are being purchased as outlined by the Section 508 law

Measurement of effectiveness: The percentage of files with proper documentation.

Component 6: The identification of roles and responsibilities associated with this process.

User/Requestor

This is the individual and unit seeking to acquire an E&IT product or service. The appropriate campus administrator, e.g., Vice President, Dean, Department Head, Director, etc., is responsible for ensuring that E&IT acquisitions made by employees in their division, college, department or unit conform to applicable policies and procedures, including Section 508. They are expected to:

1. Develop accurate and supportable functional requirements for the requested product/service;
2. Conduct in-depth, accurate and complete market research to identify potential sources that meet the functional requirements;
3. Provide necessary information to develop formal solicitation documents, including criteria to evaluate proposals and product conformance;
4. Consult with E&IT Campus Compliance Officer to determine which Section 508 requirements apply and to solicit the appropriate documentation from the vendor;
5. Verify vendor submission of Section 508 compliance information;
6. Work with their LAN Coordinator, ITS Technical Consultant(s) and E&IT Campus Compliance Officer as needed to evaluate vendor responses to Section 508 requirements;
7. Obtain E&IT Campus Compliance Officer approval, including an exemption if appropriate;
8. Provide the acquisition request and approved Section 508 documentation to the Buyer; and
9. When granted an exemption, develop and implement plans to provide alternative access in consultation with E&IT Campus Compliance Officer, Disability Resource Center, Employment Equity and Faculty Recruitment, and other relevant campus offices.

E&IT Campus Compliance Officer

The Vice Provost/Chief Information Officer has designated the ITS Policy Assurance Officer to serve this function at Cal Poly. This person is expected to:

1. Assist User/Requestor to identify and solicit Section 508 compliance documentation;
2. Assist User/Requestor, LAN Coordinator and/or ITS Technical Consultant(s) to review and evaluate vendor-submitted Section 508 compliance documentation;
3. Evaluate and make recommendations based on vendor-submitted Section 508 compliance documentation, including approving requests for exemption and working to resolve non-conformant procurements and contractor product problems by creating win-win solutions;
4. Escalate requests for exemptions and related issues to VP/CIO when appropriate;
5. Work with User/Requestor, Disability Resource Center, Employment Equity and Faculty Recruitment, and other relevant and affected campus offices to develop plans for providing alternative access and timelines for achieving compliance;
6. Coordinate development, implementation and evaluation of Cal Poly's Section 508 plans and programs;
7. Promote the importance of Section 508 efforts, including coordination of campus-wide communication and training efforts; and

8. Serve as advisor on Section 508 matters to Contracts and Procurement Services, Disability Resource Center, Employment Equity and Faculty Recruitment, management, the campus community and outside entities where appropriate.

<u>Buyer</u>

In a formal process, the Buyer 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 informing the User/Requestor of campus requirements and reviewing 508-related documentation to verify appropriate approvals have been obtained and documentation has been submitted for inclusion in the procurement file. They are expected to:

1. Inform the User/Requestor of campus requirements, including Section 508, and direct them to campus resources for information and assistance, e.g., Accessibility Website, ITS Contacts, etc.;
2. Process properly documented E&IT acquisition request;
3. Provide 508 requirements in all formal E&IT solicitations, including assignment of points in evaluation criteria, if appropriate;
4. Consider only vendors for the acquisition who have complied with Section 508 documentation requirements unless an approved exemption has been granted as outlined above;
5. Purchase product according to CSU policies and procedures; and
6. Ensure that Section 508 requirements are contained in contracts awarded when applicable, e.g., unless an approved exemption has been granted as outlined above.

<u>College/Department LAN Coordinators and ITS Technical Consultants</u>

LAN Coordinators and/or ITS Technical Consultants will serve as the primary interface between the Section 508 requirements and technical specifications for the User/Requestor and their department. ITS Technical Consultants in E&IT specialty areas may be assigned on an as needed basis to assist with Section 508 issues and to advise the User/Requester and/or LAN Coordinator on technical requirements and specifications, e.g., how to integrate the product within the E&IT infrastructure. Their roles and responsibilities may include:

1. Assist the User/Requestor with functional and technical requirements and market research;
2. Assist the User/Requestor with evaluating vendor Section 508 documentation;
3. Evaluate products with the E&IT Campus Compliance Officer to determine if and how the product complies with 508 standards and to evaluate the technical credibility of exemption requests;
4. Work with the Buyer on technical questions and issues during the E&IT acquisition process;
5. Participate as the Section 508 technical representative in planning and developing E&IT product and service requirements, e.g., software development, training, etc.;
6. Participate as the technical resource in developing plans for providing alternative access and/or resolving specific accessibility issues of students, faculty, staff and the public; and
7. Advise and consult with the E&IT Campus Compliance Officer on technical matters related to accessibility issues.

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	9/14/07
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 the current Low Value Procurement Procedures (LVPP). P-Card purchases exempted	9/1/08
Develop and Implement E&IT Procurement Procedure for all acquisitions greater than LVPP, including P-Card.	9/1/09
Develop and Implement E&IT Procurement Procedure for acquisitions less than or equal LVPP.	9/1/10

NOTE: Timelines for 2008-10 will be modified based on lessons learned in 2007-08. They may be subject to change based on CSU efforts to address issues such as purchases using the P-Card.

September 1, 2007 Milestone

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

Task	Timeline	Responsible Party
Introduce of ATI and Software Decision Process for software purchases exceeding $5,000 in TCO (Total Cost of Ownership)	March 2007	C&PS, ITS
Identify E&IT Campus Compliance Officer	June 2007	VP/CIO
Submit E&IT Procurement Plan	9/14/07	VP/CIO & C&PS
Implement E&IT Procurement Procedure for acquisitions greater than $50,000 (NOTE: Process is already in place but needs to be documented.)	9/1/07	C&PS, ITS
Document 508 Procurement Plan, Policy, Procedures for E&IT Acquisitions Exceeding $50,000, etc., and Post on Campus Procurement Website with links from Campus Accessibility and IT Policy Websites	9/30/07	C&PS, ITS
Document standards and practices for developers of Web-sites and Web-based applications and services	9/30/07	ITS
Discuss with President's Management Staff	September	VP/CIO
Discuss Plans with Campus Constituent Groups	Fall 2007 (Sept/Oct)	VP/CIO & ATI Team
Develop and Disseminate Campus Announcements, e.g., mass emails, Cal Poly Report, regular mail, etc.	10/1/07	C&PS, ITS

Task	Timeline	Responsible Party
Section 508 and VPAT Training for CSU Buyers and E&IT Campus Compliance Officers	Fall 2007 (Oct/Nov)	CSU
Conduct Open Forums and Informational Sessions	Quarterly - Dates TBD	C&PS, ITS
Consult with Users/Requestors, LAN Coordinators, and Departments on specific procurements	Ongoing	C&PS, ITS
Develop FAQs based on input from campus	Ongoing	C&PS, ITS
Develop Training Program and Materials based on identified campus needs	TBD	C&PS, ITS
Develop Hardware Decision Process modeled on Software Decision Process, e.g., Checklist for E&IT Hardware Purchases, and decide if more checklists or documentation is needed for other type of E&IT purchases, e.g., multimedia, telecommunications, etc.	3/1/08	ITS

September 1, 2008 Milestone

Develop and Implement E&IT Procurement Procedure for acquisitions greater than LVPP which is currently defined as $3,500. P-Card purchases are exempted.

Task	Timeline	Responsible Party
Based on lessons-learned from 9/1/07 process, start developing pilot	3/15/08	C&PS, ITS
Create documentation	4/1/08	C&PS, ITS
Start training process	4/15/08	C&PS, ITS
Start pilot	5/1/08	C&PS, ITS
Evaluate pilot	7/1/08	C&PS, ITS
Fine tune process based on pilot	7/15/08	C&PS, ITS
Develop forms, procedures, instructions, training, and communications	8/1/08	C&PS, ITS
Develop communications and training plan	8/15/08	C&PS, ITS
Start working on centralized data base of conforming products	8/15/08	C&PS, ITS, CSU
Implement new procedure	9/1/08	C&PS, ITS

September 1, 2009 Milestone

Develop and Implement E&IT Procurement Procedure for all acquisitions greater than LVPP which is currently defined as $3,500, including P-Card.

Task	Timeline	Responsible Party
Work with CO, P-card holders and CFO on process	5/15/09	C&PS, ITS
Create proposed process	6/15/09	C&PS, ITS
Conduct focus groups	7/1/09	C&PS, ITS
Evaluate comments from focus groups	7/15/09	C&PS, ITS
Fine tune process based on pilot	7/15/09	C&PS, ITS
Develop forms, procedures, instructions, training, and communications	8/1/09	C&PS, ITS
Centralized data base of conforming products	8/1/09	CSU
Develop communications and training	8/15/09	C&PS, ITS
Implement new procedure	9/1/09	C&PS, ITS

September 1, 2010 Milestone

Develop and Implement E&IT Procurement Procedure for acquisitions less than or equal to LVPP which is currently defined as $3,500.

Task	Timeline	Responsible Party
Work with CO, credit card holders and CFO on process	5/15/10	C&PS, ITS
Create proposed process	6/15/10	C&PS, ITS
Conduct focus groups	7/1/10	C&PS, ITS
Evaluate comments from focus groups	7/15/10	C&PS, ITS
Fine tune process based on pilot	7/15/10	C&PS, ITS
Develop forms, procedures, instructions, training, and communications	8/1/10	C&PS, ITS
Centralized data base of conforming products	8/1/10	CSU
Develop communications and training	8/15/10	C&PS, ITS
Implement new procedure	9/1/10	C&PS, ITS