Electronic & Information Technology Purchases Process

PAB

Monday, December 12th, 2011
Agenda

• Audit Finding
• ATI Requirements
• ATI Technology Purchase Workflow and Form
• Next Steps
ELECTRONIC AND INFORMATION TECHNOLOGY PURCHASES
The campus had not fully implemented procedures to identify and review electronic and information technology (E&IT) purchases and to obtain required Voluntary Product Evaluation Template (VPAT) documentation from vendors.
CSU Product Accessibility Documentation Guidelines require campuses to ensure that all E&IT products meet recognized accessibility and usability standards, including Section 508 of the Rehabilitation Act, at the time of procurement or adoption. The guidelines further require that vendors complete a VPAT for all E&IT products covered under the Section 508 standards.

The director of contracts and procurement stated that procedures had been developed for the information technology division to review purchase requests for E&IT purchase requisitions prior to procurement, but the procedures had not been fully implemented due to competing priorities in the information technology division.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES
Failure to identify and review E&IT purchases and obtain VPAT documentation from vendors increases the risk that these purchases may not comply with federal and state accessibility standards.

Recommendation 1
We recommend that the campus fully implement procedures to identify and review all E&IT purchases and obtain required VPAT documentation from vendors.

Campus Response
We concur. The campus will fully implement procedures by December 30, 2011, to identify and review all E&IT purchases and obtain required VPAT documentation from vendors.
The CSU procurement and contract process for EIT acquisition is amended to include the Electronic and Information Technology Accessibility Standards at 36 CFR Part 1194. Vendors who wish to do business with the CSU must provide information about their product’s conformance to applicable accessibility standards via the Section 508 Evaluation Template also known as the Voluntary Product Accessibility Template (VPAT). The CSU Guide to Voluntary Product Accessibility Template and the templates themselves are available to assist vendors in this process. 
http://www.calstate.edu/Accessibility/EIT_Procurement/

Accessible Technology Initiative Reporting
Campus process and progress on implementation is also a component of the CSU Accessible Technology Initiative report. concur.
ATI Technology Purchase Workflow

1. Department / Requestor

2. Complete ATI Technology Purchase form; attach VPAT

3. Submit Purchase Req to C&P
   - Attach ATI Technology Purchase form and VPAT

4. Contracts & Procurement process Purchase Requisition
ATI Technology Purchase Workflow - EXCEPTIONS

If no VPAT exists

- Department / Requestor
  - Complete ATI Technology Purchase form

Route to VPIT or delegate

Can accommodations be made?

If Yes
- Information Technology work with Disabled Student Services to determine if accommodation is possible
  - Route to C&P

If No
- Information Technology work with department on possible exception or alternate plan
  - Contracts & Procurement process Purchase Requisition
Next Steps

Message to Campus describing new process from CIO/Executive Sponsor

Construction of campus accessible repository for VPAT’s
Questions?