



SAN JOSÉ STATE UNIVERSITY

Accessible E&IT Procurement Implementation Plan

SJSU ATI Task Force on Accessible Electronic and Information Technology

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Introduction

The purpose of this document is to set forth San José State University's (SJSU) plan to address the elements and timelines for ensuring the procurement of accessible E&IT as contained in the Coded Memoranda AA-2006-41 and AA-2007-04 issued by the California State University (CSU) Office of the Chancellor.

This plan will describe the implementation of an accessible procurement process for SJSU E&IT formal solicitations and acquisitions greater than \$50,000, from the initiation of the request to the receipt of the goods by the End User located in public domain. For purposes of this process, a Single User is a person for whom a product has been purchased for use in one location with set standards and defined needs.¹

At SJSU, the Provost is the Executive Sponsor for the SJSU Accessible Technology Initiative. The SJSU Accessible Technology Initiative (ATI) Task Force, in collaboration with working teams appointed by the Provost, will be responsible for ensuring SJSU's compliance with Section 508 standards in all areas including the procurement of accessible E&IT.

Accessibility Regulations for Electronic & Information Technology

The technical standards of Section 508 of the Rehabilitation Act of 1973, as amended, provide criteria specific to Electronic & Information Technology (E&IT) acquisition. E&IT includes information technology and any equipment, 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 and operating systems, 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, and medical equipment where information technology is integral to its operation, is not considered E&IT products that fall under Section 508 requirements.

California Government Code Section 11135 and CSU Executive Order 926 require the CSU to purchase E&IT products and services that comply with the requirements of Section 508 of the Rehabilitation Act of 1973, as amended.²

¹ Individuals needing accommodations need to document their needs and make their requests to the Employment Accommodations Resource Center (EARC). (Definition and explanation of Single User is more described in Appendix A)

² E&IT is defined by the Access Board at 36 CFR 1194.4 and in the FAR at 2.101

Element 1:

Research, evaluation, documentation, verification and user testing where appropriate, and determination of exceptions related to E&IT.

The following are considered core functions of accessible E&IT Procurement:

- Create functional requirements for purchasing a product.
- Conduct market research to determine the availability of a product that meets functional requirements.
- Evaluate products to determine the degree of compliance with Section 508 standards and identify the one that best meets these requirements.
- Require all vendors to submit Section 508 compliance documentation (e.g., a completed VPAT or vendor checklist).
- Conduct user testing as needed to validate accessibility.
- Verify Section 508 conformance and authorize exceptions, if any.
- Document Section 508 accessibility evaluations and conclusions.

Outline of Procurement Plan Process

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 are defined by campus specific procedures and business processes. In accordance with the parameters and timelines set out in this Procurement Plan, SJSU procedures and business processes will be updated to include the requirements for the acquisition of E&IT products. In general, SJSU procurement activity falls into two broad categories: Formal competitive procurements exceeding cost thresholds established by CSU policy or when the Buyer deems necessary, and Procurements at costs that fall below the competitive threshold and are made via informal methods and adherence to best practice.

Formal Competitive Procurements

E&IT procurements subject to formal competition requirements will require the End User to conduct market research in consultation with the Purchasing Office with regard to the commercial availability of accessible products. This information will be used to develop formal solicitation documents, which will include requirements for bidders to submit Section 508 compliance documentation.

The End User, with the assistance from the Compliance Office (CO) and the Purchasing Office, will determine the information that firms will be required to submit to document the degree of compliance with Section 508 standards as well as the criteria and 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 that are still relevant will be evaluated as well. The contract award will be made to the

vendor proposing the commercial product that provides the greatest degree of compliance while satisfying other legal, policy and functional requirements.

Procurements at costs that fall below the formal competitive threshold

These E&IT procurements require the End User to perform market research with assistance, as needed, from the Purchasing Office. Once compliant E&IT products have been identified or an exception has been approved, the End User will submit Section 508 documentation along with a Purchase Requisition to the Buyer, in order to complete the purchase in accordance with applicable procurement policies and procedures.

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

- For products that meet the Section 508 standards: The Buyer may purchase any of the products evaluated in accordance with applicable procurement policies and procedures.
- For products evaluated that meet Section 508 standards to varying degrees: The CSU schedule for E&IT acquisitions equal to or below \$50,000 is scheduled for no later than September 1, 2008. The policies and procedures that govern these acquisitions have not yet been finalized. When completed, these procedures will require the incorporation of Section 508 standards with all other applicable procurement laws and regulations to determine which E&IT product will be procured.
- For products previously purchased and 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.
- For E&IT products that have an approved exception within one of the allowable categories: The Buyer may purchase the product in accordance with applicable procurement policies and procedures.

Exceptions

Exceptions from compliance to Section 508 standards may be authorized in certain situations, based on appropriate research, evaluation, documentation, review and approval. All exceptions will include the following steps:

- Research and Supporting Documentation– Includes a cost analysis to determine the net cost to the campus in procuring a product that conforms to Section 508 standards.
- Evaluation –The cost analysis must include an evaluation of present cost savings vs. the long-term cost likely to be incurred by SJSU in the future to provide access or accommodations to persons with disabilities.
- Review – Cost analysis should be reviewed by the Compliance Office to verify calculations and assumptions made when assessing short and long term costs.

- Approval - The Compliance Office will determine that the evidence of increased cost to the campus to procure a conforming product is justifiable and supportable.

SJSU may consider the following exceptions:

Net Cost Increase

The CSU has a specific exception based in California's Government Code Section 11135(c) (2).³ This section of the Government Code exempts the CSU from Section 508 standards if it can be determined that the procurement of an accessible E&IT product will increase the cost to the campus.

Commercial non-availability

When acquiring E&IT products or services SJSU is 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. The campus need not acquire a custom item in these cases solely to satisfy Section 508 standards. Commercial non-availability must be addressed on an individual standard basis, and the campus cannot claim a commercial product as a whole is non-available just because it does not meet all the applicable standards. In such cases the campus shall follow its applicable procurement policies and procedures to purchase the product that best meets Section 508 standards or best value criteria.

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 standards.

Back Office

Back Office refers to a group of products that do not interact with people except when maintenance is required such as products that reside in either a telecommunication closet or data center. For example, if a server in a data center routinely operates without human interaction, then the server qualifies as a back office exception. If the software and/or application can be accessed remotely then the Section 508 standards apply.

³ 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)."

Fundamental Alteration and Undue Burden

These exceptions to Section 508 standards are discussed in Element 2 below.

In addition to the exceptions above, Section 508 standards provide for other types of exceptions that may be granted. Request for these less common exceptions will be reviewed and approved on a case-by-case basis by the Compliance Office.

Element 2: Process for determining Undue Burden and Fundamental Alteration

Process for Determining Undue Burden

Section 508 standards define undue burden as a product acquisition that causes “significant difficulty or expense” to the organization.

When determining if an E&IT product qualifies for an undue burden, the campus must consider the resources available to the entire campus, not only to the college, department or program 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 CSU infrastructure, including security considerations, and the difficulty of integrating the product.

To initiate the determination of whether an E&IT product or service qualifies as an undue burden, the End User, will submit documentation and requisition to the Compliance Office for review and recommendation. The components of an Undue Burden are detailed in Appendix C, attached.

After the review, the Compliance Office will forward the recommendation to the campus President and the appropriate Vice President. The President will have the final authority to approve or disapprove the undue burden request.

A copy of the final determination of the undue burden recommendation shall be retained by the Compliance Office and also included in the procurement file. Campus officials shall make these records available upon request.

If an undue burden is approved, it is important to note that by statutory obligations SJSU must provide alternative access to persons with disabilities. This should be part of the Compliance Office recommendation and the process is more fully described in Element 3 of this document.

Process for Determining Fundamental Alteration

SJSU 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. 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.

Technology in this area is rapidly evolving and an exception granted for one procurement purchase 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 End User and the Compliance Office must be cognizant of the technology in this field to ensure that the exception is valid. The determination of fundamental alterations includes the following steps:

- Research – End User will determine the functional requirements and the specific need for the E&IT product and will research potential accessible alternatives in the marketplace.
- Evaluation – End User with assistance from the Compliance Office will review the accessibility of the product and the impact of the accessible product to the functional requirements.
- Documentation – Vendor product documentation and specifications.
- Review – The request must be reviewed by the Compliance Office.
- Approval – Compliance Office approves the exception for fundamental alteration.

Element 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.

“Equivalent facilitation” focuses on whether an E&IT product provides access that is equal to or greater than that required in the technical provisions of Section 508 standards. Section 508 standards focus on whether the technology itself is designed to afford a specific degree of accessibility. By contrast, an alternative means of access focuses on the accessibility of the information and data, rather than the technology. Under Section 508 standards, CSU has a statutory obligation to make information and data available by an alternative means of access if the acquiring the E&IT would impose an undue burden or is an approved exception. The CSU has additional obligations under Sections 501 and 504 of the Rehabilitation Act, including the obligation to provide employees with disabilities “reasonable accommodations” which focuses on the needs of a particular individual with a

disability. When an exception from Section 508 standards is approved, the Compliance Office and End User, in consultation with appropriate campus offices, will assess the potential impact on students, employees, and members of the public and plan for alternate access methods and/or accommodation for persons with disabilities.

The Compliance Office will continue its role of coordinating access services for students, staff, and faculty with disabilities on campus. The Compliance Office and other support staff will assist representatives from all aspects of campus educational and work activities in regards to providing access to E&IT for people with disabilities. The Compliance Office's assistance will include research, advice and recommendations about the means of providing equally effective alternative access or reasonable accommodation. When appropriate and necessary, the recommendation may be for the Compliance Office to provide a direct service, academic adjustment, or work accommodation to an individual with a disability.

Typical components of a plan for providing equally effective alternate access might include:

- Identifying a point person (and back-up) within the End User's work area that, with support from the Compliance Office, will be responsible for coordinating equally effective alternate access to the E&IT acquisition.
- Documenting the means for providing alternative access or accommodation when necessary.
- Inclusion of an outreach statement in the related department's standard operating procedures, website, literature, course outlines, etc. that notifies individuals with disabilities who are not able to access the E&IT to contact the point person to obtain assistance.

Element 4:

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

Communication Process

Initial communication to the campus regarding accessible E&IT procurement will be a combination of general announcements and targeted meetings:

- A general announcement will be distributed to the campus community by the Executive Sponsor of the SJSU Accessible Technology Initiative and repeated on a regular basis during the initial months of implementation.
- A written general announcement to senior administrators, and designated department end users and to the campus community will be circulated via e-mail.

The general announcement will provide a brief overview of accessible E&IT procurement and how to get additional information.

- More detailed targeted announcements will be made to groups such as Financial Users Group, MPP, Council of Deans, Associate Deans, Divisional Managers, IT Advisory Panel, and other groups that may be identified on an ongoing basis.

Ongoing communication regarding accessible E&IT procurement will include such elements as:

- Keeping the current ATI Accessibility and Procurement websites up to date with current forms, policy, procedure, informational links and other useful resources to assist the campus in implementing accessible E&IT procurement.
- Work with the Compliance Office to identify groups and venues on an ongoing basis where there are opportunities to present announcements or reminders of Section 508 standards.
- Establishing focus groups. During the first year of implementation a primary purpose of the focus groups will be to solicit input on practices and procedures to be developed to ensure a smooth and effective implementation of the next ATI milestone at September 1, 2008.

Training Plan

- Each of the opportunities to meet with a targeted group will also be a training opportunity at a general level with respect to forms, checklists, and available resources.
- The ATI Procurement team will develop and implement an online training tool and guide.
- In-person training will be provided by the Compliance Office and the Procurement Office.
- The online, in-person, and training guide would include an introduction to the Section 508 standards, methods of obtaining vendor certification of conformance (VPAT, questionnaire, etc.), internal forms for documenting market research, process for determinations in cases of none or partially conforming products, and process for requesting review of exceptions.
- The Purchasing Manager and the Compliance Office will train buyers and contract staff in Section 508 requirements and serve as a resource for compliance questions relating to purchase orders and contracts.
- Appropriate personnel will attend CSU system wide training opportunities when they are made available.
- Other training models (e.g. handbook, web based presentation) will be reviewed for deployment in advance of the September 1, 2008 implementation milestone.

Element 5:

An evaluation process to measure the effectiveness of the plan

The goal is for 100% of acquisition requests to comply with Section 508 standards. This goal is met by enforcing the process outlined in Element 1, above.

In year one the evaluation process will include an annual review of all E&IT procurements that exceed the \$50,000 threshold. In subsequent years the evaluation process will include an annual review of all E&IT procurements that exceed \$50,000 and a semi-annual review of a representative sampling of all other E&IT procurements.

The review will verify that the proper Section 508 processes were followed, and that documentation of compliance with Section 508 and/or CSU policy has been completed and included in the procurement files. The evaluation will measure three criteria:

- End User has conducted market research and an evaluation of the E&IT product for Section 508 standards conformance;
- Buyer is only accepting E&IT acquisition request that have the proper Section 508 documentation;
- Buyer is purchasing E&IT products as outlined by Section 508 and/or CSU policy.

Element 6:

The identification of roles and responsibilities associated with the above process

Roles and Responsibilities for individuals associated with the accessible E&IT procurement process are listed below:

- A. End User** – The individual(s) who is initiating the request for the acquisition of an E&IT product or service. Although End Users have primary responsibility to determine functional requirements, conduct research and document the process, they will be supported by the Compliance Office and procurement staff to ensure SJSU's E&IT procurement processes is successfully followed.

- B. Buyer** – The staff person in the Purchasing Department with delegated authority to process the actual procurement of the E&IT product or service based on purchase requests made in accordance with standard campus procedures. Under the supervision and management of the Director of Procurement and Support Services, the Buyer:
 - Ensures that complete and approved compliance documentation is submitted with the purchase request.

- Except in cases of approved exceptions and when no product is fully conformant, considers only vendors, products and services for acquisition that conform to Section 508 standards.
- For procurements where available products meet Section 508 standards to varying degrees, ensures that the purchase decision incorporates Section 508 standards with all other applicable procurement laws and regulations.
- Assists End User to develop formal solicitation documents for E&IT that include Section 508 compliance standards and evaluation criteria.
- Ensures that Section 508 standards are contained in contracts awarded.

C. ADA Compliance Office (CO) – The ADA Compliance Office consists of the ADA Compliance Officer, the ADA Compliance Specialist and the Section 508 Compliance Coordinator.

ADA Compliance Officer:

- Promotes the importance of Section 508 standards and ensures consistent implementation of Section 508 programs.
- Coordinates all of the Section 508 and ADA compliance requirements.
- Evaluates and approves exception requests and submits recommendations for approval.
- Assists with the resolution of complaints regarding E&IT products and services with an approved exception.
- Works with relevant offices to address accessibility issues for students, employees and members of the public.

ADA Compliance Specialist:

- Assists End Users and other staff and faculty to understand and comply with Section 508 standards regarding E&IT acquisitions.
- Assists End Users in the review and documentation of the Section 508 standards for E&IT products and services.
- Assists with evaluating and verifying Section 508 compliance documentation submitted.
- Works with End User and the DRC staff to develop plans for alternative access or accommodation for E&IT products or services with an approved exception.
- Oversees the development, provision and coordination of Section 508 training programs for the campus community.

Section 508 Coordinator:

- Serves as a technical resource to in all areas of accessible E&IT products and service procurements to include End User, Purchasing Office, Buyer and Compliance Office.

- Oversees the development, provision and coordination of Section 508 training programs for the campus community.
- Maintains a local database of Section 508 review and documentation efforts; acts as liaison for CSU system wide database and documentation program; researches and compiles external sources of Section 508 compliance information.
- Evaluates vendor responses to Section 508 compliance documentation and verifies technical compliance information submitted.
- Serves as a technical resource to End User and the DRC staff to develop plans for alternative access or accommodation for E&IT products or services with an approved exception.
- Assists the Compliance Office by evaluating the technical credibility of a request for an undue burden.

**Element 7:
Milestones and timelines that conform to dates required by Coded
Memo AA-2007-04**

CSU required timeline:

Required Timeline	Due
Submission of E&IT Procurement Plan	9/1/07
Develop and Implement E&IT Procurement Procedure for acquisitions greater than \$50,000.	10/1/07
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

SJSU proposed milestones and timelines:

September 1, 2007 Milestone

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

Task	Timeline
Submission of E&IT Procurement Plan – draft outline	9/1/2007
Submission of E&IT Procurement Plan	10/1/2007

Task	Timeline
Communication Process.	8/15/2007 and ongoing
Training of Procurement Staff in policy and requirements	10/1/2007 and ongoing
Identify Compliance Office staff and associated responsibilities	9/1/2007
Implement E&IT Procurement Procedure for acquisitions greater than \$50,000	10/1/2007
Training of Procurement and Compliance Office staff	10/1/2007 and ongoing

September 1, 2008 Milestone

Develop and Implement E&IT Procurement Procedure for acquisitions greater than \$2,500. Procard purchases exempted

Task	Proposed Timeline
Solicit focus groups input on policy and practice for the 09/01/08 implementation	4/2008
Based on lessons-learned from 9/1/07 and focus group input process, start developing pilot	Summer 2008
Start pilot	Summer 2008
Evaluate pilot	01/2009
Fine tune process develop forms, procedures, training and communication materials	07/30/2009
Communication Process. Announcements to campus.	Spring 2009
Training of key people in processes	Spring 2009
Milestone implementation date	08/1/2009

September 1, 2009 Milestone

Develop and Implement E&IT Procurement Procedure for all acquisitions greater than \$2,500 including Procurement credit card purchases.

Task	Timeline
Work with Compliance Office (CO), credit card holders and CFO on process	5/15/2009
Create proposed process	6/15/2009
Conduct focus groups	7/1/2010
Evaluate comments from focus groups	7/15/2009
Fine tune process based on pilot	7/15/2009
Start working on forms, procedures, instructions, training, and communications	7/15/2009
Communication Process. Start working on centralized data base	8/1/2009

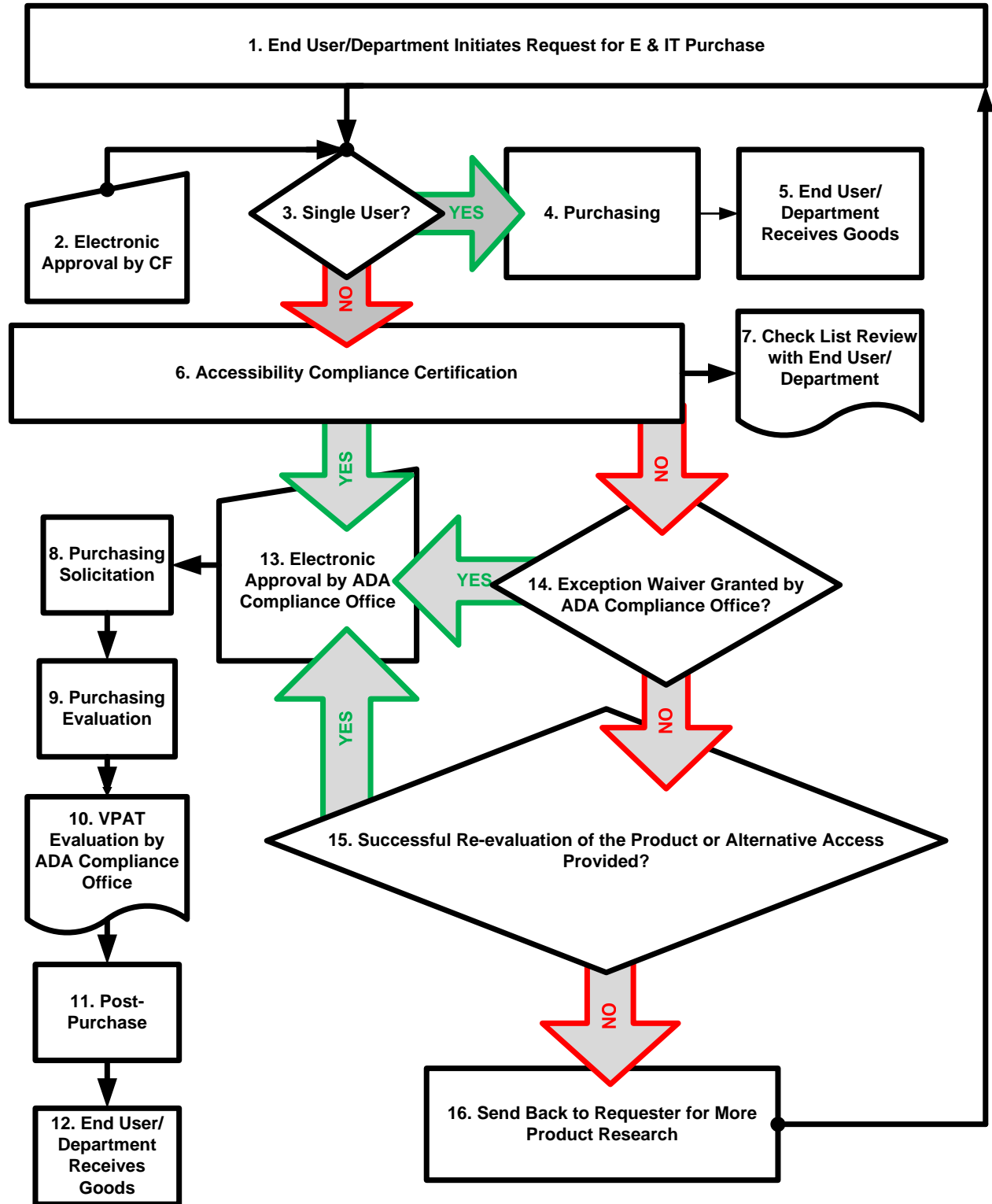
of conforming products	
Training of key people in processes	8/15/2009
Milestone Implementation Date	9/1/2009

September 1, 2010 Milestone

Develop and Implement E&IT Procurement Procedure for acquisitions less than or equal to \$2,500.

TBD.

APPENDIX A: Procurement Process Flowchart



APPENDIX B: Flowchart Explanation

1. End User/Department: The originator of the requisition and/or the ultimate consumer of a product who will create a web purchase requisition and will work with ADA Compliance Office and Purchasing Department to accommodate that person or a group of people.

2. CF Approval: Central Finance Approving Official who must verify the availability of funds.

3. Single User: An individual person for whom the product has been purchased with set standards and defined needs. Product shall not be placed in the public domain or be used by students.

4. Purchasing: Purchasing will select and make an award with a selected vendor. Note: End User/Department to collect all necessary documentation for the single user purchase and forward it to purchasing prior to award.

5. and 12. End User/Department Receives Goods: The end of the procurement process where the end user/department receives E&IT goods or services.

6. Accessibility Compliance Certification: The End User initiates the Section 508 Steps in Procurement Process and the pre-purchase Voluntary Product Accessibility Testing (aka VPAT) (whenever possible), and complete the SJSU E&IT Procurement Checklist with participation of the ADA Compliance Office.

7. Checklist Review with End User/Department: ADA Compliance Office assists End User/Dept in the review and documentation of Section 508 compliance for E&IT products. Preliminarily reviews and assists with the evaluation of Subparts B, C, and D of Section 508 along with Exceptions to Section 508 standards. Upon review completion, the checklist will be forwarded to the Purchasing Department.

8. Purchasing Solicitation: Purchasing Department to collect all necessary documentation, develop a schedule for formal Bidding/Solicitation process, advertise and receive bid responses from vendors.

9. Purchasing Evaluation: Purchasing will open and evaluate bids and forward ADA and/or Section 508 documentation to the ADA Compliance Office and End User/Department for review and verification.

10. VPAT Evaluation: End User/Dept will advise Vendors for E&IT procurement to be awarded by SJSU. Vendors are required to complete VPAT market research requirements for E&IT products as defined by Section 508 regulations. ADA Office Section 508 Compliance Specialist will review VPAT to evaluate technical credibility and serve as technical resource to evaluate and approve product compliance.

11. Post-Purchase Testing: In the event post-purchase testing indicates that the product is not compliant, the product shall not be implemented, unless an exception waiver is obtained from the ADA Compliance Office; refer to item 14, 15 and 16. Alternative: Purchasing selects next lowest responsible bidder's product that 'best meets the standards' based on VPAT evaluation by ADA Compliance Office; refer to item 10.

13. ADA CO Approval: ADA Compliance Office to approve established minimum criteria to enforce Section 508 standards for the purchase.

14. Exception Waiver Granted by ADA CO: Exceptions from compliance with Section 508 standards may be authorized by the ADA Compliance Office based on the appropriate research, evaluation, documentation, review and approval. Those categories include: Net cost increase, commercial non-availability, sole brand, back office (refer to SJSU E&IT Procurement Plan, pg. 6).

15. Successful Re-evaluation of the Product or Alternative Access Provided: E&IT acquisitions approved for exceptions or are not yet subject to E&IT accessible procurement process, requires alternative methods of access or accommodation for persons requiring such access (Section 501/504 Rehab Act).

16. Terminate Requisition Request: Documentation goes back to the requester/departments for more product research and/or alternate vendor review and/or requestor needs assessment.

APPENDIX C: Components of an Undue Burden Request

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;
 - All funds available to the campus/ 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.
- Resubmission of undue burden request every two years until the product is conformant.