



California Community Colleges  
Chancellor's Office

## Frequently Asked Questions

Updated 12/7/2018

### Purchasers

**1. As a purchaser, what is my role and responsibility regarding accessibility?**

Purchasers are part of the process of ensuring equal access to information and communication technology for students, faculty, and staff in the California Community College system.

**2. What is Section 508, what is covered under it, and when does it apply?**

Section 508 of the Federal Rehabilitation Act of 1973 is a federal law that was adopted in California as California Government Code 11135 and further adopted by the California Community College System on January 1<sup>st</sup>, 2003. The law mandates that all information and communication technology developed, procured, maintained, or used by state supported, operated, funded or administered programs and activities be accessible to people with disabilities. The law also establishes standards for what is considered technological accessibility.

**3. Does Section 508 only apply to things purchased for student use?**

No. Section 508 applies to all information and communication technology intended for general public consumption that is developed, procured, maintained, or used by California Community Colleges, not just information and communication technology for students.

**4. What if the vendor chosen through the procurement process is not 508 Compliant?**

Companies whose products do not comply with Section 508 are not considered responsive, and as such, are not eligible for consideration or award of the contract or purchase order.

**5. Whose job is Section 508 compliance? Isn't it DSPS's responsibility to handle everything related to accessibility, including Section 508?**

As Chancellor Oakley indicated in his [letter](#) on June 19, 2018, DSPS has no responsibility for complying with Section 508, rather addressing accessibility is a shared responsibility amongst all other involved parties, including but not limited to, the Chancellor's office, California Community Colleges senior administrators, technology professionals, purchasers, human resources and creators of information and communication technology, including instructional materials. Each college district has the responsibility to comply with Section 508, using the guidance provided by the Chancellor's Office.

**6. What is a VPAT?**

VPAT stands for Voluntary Product Accessibility Template and was developed by the Information Technology Industry Council (ITIC) to assist with purchasing. It is a document that may be generated by a vendor to indicate a product's conformance with the Section 508 accessibility standards, however it is a marketing tool and was not developed with federal approval. The purpose of the VPAT is to assist federal contracting officials and other buyers in their market research responsibility when making preliminary assessments regarding the commercial availability of Information and Communication Technology products and services with features that support accessibility.

**7. As a purchaser, what are the requirements I look for to determine if a product is accessible? Is acquiring accessibility documentation (such as a VPAT) sufficient, and/or is it sufficient if a vendor says they are accessible?**

As a purchaser, it is your responsibility to verify that the product you seek to purchase is accessible. This goes above and beyond receiving written or verbal assurance of accessibility from a vendor. As a starting point for gaining more information, request the vendor submit an accessibility conformance report that includes the VPAT 2.1 version (or higher) as part of the accessibility documentation.

After this, perform some basic tests on your own to evaluate the following elements:

1. Can you use the tab-key to navigate to and from all interactive elements, including hyperlinks, form fields, and buttons?
2. Can you activate hyperlinks with the Enter/Return key?
3. Can you activate buttons with the Spacebar or Enter/Return key?
4. If you click on a form field's text label, does the cursor move into that form field?
5. Do videos have controls to pause or stop the playback?
6. Do videos have captions?
7. For any blinking, scrolling, or moving content, are there controls to pause, stop, or hide that content?

8. Does any content flash more than three times in a one second period?

Make sure to follow up by asking the vendor questions about the product such as:

1. What standards do you use when evaluating your product's accessibility support?
2. What internal processes do you use to evaluate and remediate accessibility issues? Do you use any assistive technology applications?
3. Do you develop solutions that conform to [Section 508 of the Rehabilitation Act](#) and/or the [WCAG 2.0, Level AA](#) specifications?
4. What types of documentation can you provide about the product's accessibility conformance?
5. How is accessibility supported during product development and quality assurance testing so as to ensure the equivalent ease of use for individuals with disabilities?
6. Is there a designated accessibility representative at your company to address issues or questions about accessibility issues?
7. What training and experience do the technical teams have in creating accessible products and/or services? Is accessibility training or support updated on a regular basis for internal teams?
8. What types of [automated and manual accessibility](#) testing procedures do you perform?
9. How do you ensure keyboard and/or touch support for any interactive elements?

There are no correct answers to the above questions, rather what you are attempting to discern is familiarity with a concept versus an understanding and capability to implement accessible solutions.

If the vendor's answers to the above questions inspire confidence, request a product demonstration and user testing. If you verify during the demonstration that the product adequately answers addresses the above questions, you may feel confident the technology is accessible.

The purchasing team and 508 Work Group at your district are available to assist you in this process. For more information, see the Accessibility Center's page on [Interacting with Vendors](#).

#### **8. Is there training, a rubric, or third-party validation available for purchasing?**

Various resources with the California Community College system exist to provide feedback on product accessibility including:

- The [Alt Media](#) and [IT Access](#) mailing lists provide venues to discuss accessibility concerns of various Web and IT products. Members can also post questions regarding the level of accessibility of products and services.
- [California Community Colleges Accessibility Center \(CCCAC\)](#) provides procurement staff with strategies and information about how to ensure that vendor products are accessible including RFP guidelines and sample contract language.
- [CCC Accessibility Center Workshops](#) discuss procurement practices to ensure accessibility. Accessibility workshops are held in conjunction with Information Security workshops, and are called out this way in marketing materials.
- [Disabled Student Programs and Services \(DSPS\)](#) staff are a useful on-campus resource for evaluating the accessibility of a potential product, as is your college's IT Manager.

The California State University and University of California systems also host various resources for procuring accessible materials. A list can be found below:

- [CalState LA](#) provides a guide to which kinds of materials must be accessible by law (e.g. websites and multimedia).
- [University of California](#) provides guidelines for accessible procurement, a checklist of requirements that procurement professionals can include in RFPs to verify accessibility, and a guide for informing suppliers how they can demonstrate the accessibility of their products.
- California State University Access Technology Initiative – where a lot of this started

Various 3<sup>rd</sup> party services also provide resources for procuring accessible materials. One of these may be found below:

- The U.S. General Services Administration offers an [Accessibility Requirements Tool](#) to determine how Section 508 standards apply to purchasing information technology as well as [advice on requesting accessibility information](#) from vendors and contractors and [guidance on understanding the VPAT](#).

**9. My college does not have a procedure for procuring accessible materials and is interested in creating one. Where can I find examples of such procedures?**

For an example from within the CCC system, see Cerritos College's [Universal Access Review Process](#) for the purchase of new Information and Communication Technology Products.

For an example from outside the CCC system, see California State University's [Accessible Procurement Process](#) as part of that system's Accessible Technology Initiative.

For a particular implementation of that process, see CalState LA's [Electronic and Information Technology \(E&IT\) Procurement Procedures](#).

For more information from your peer California Community Colleges the list-serves and meetings hosted by the Southern California Community Colleges Purchasing Association (SCCCPA) or Northern California Community College Purchasing Group allow you to ask questions and gather best practices, feedback, and forms. Please contact your local district purchasing team for access to these list-serves.

The College Buy Team at the Foundation for California Community Colleges (FCCC) offers a best practices purchasing manual guide. This manual is updated through a work group of purchasing professionals across districts and is a resource available.

Additionally, the following [blog post](#) from WCET Frontiers lays out ways to insert accessibility into the procurement process, such as inserting accessibility into RFPs and creating systems to ensure accessible procurement from faculty and staff.

**10. Is it okay to purchase something that cannot be made accessible or that meets some but not all standards?**

Yes, as long as it can be accommodated in an equally effective manner. Additionally, items that are not intended for the general public, such as routers and firewalls, are exempt from these standards.

**11. Is my institution still responsible for items that do not go through the traditional purchasing process (e.g. things purchased through grants)?**

Yes, any information and communication technology that is required for use by faculty, staff, and managers must be accessible, or accommodated in an equally effective manner. Given that individuals making purchasing decisions may be held legally liable for decision outcomes, districts should develop processes and trainings to manage both large- and small-scale purchases. There also must be a process/training for the purchasers/faculty and information should be made available in your district's purchasing manual.

**12. What if my question isn't answered through these FAQs?**

Bring your question to the person identified on your campus accessibility resource page. If you cannot find that or you're not getting an answer, please visit the [Accessibility Center Help Desk](#).

For specific questions about content creation, please visit the [Faculty FAQs](#).