



**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 1st, 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](#)

- x 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.
- x [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.
- x [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.
- x [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:

- x [CalState LA](#) provides a guide to which kinds of materials must be accessible by law (e.g. websites and multimedia).
- x [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.
- x California State University Access Technology Initiative – where a lot of this started

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

- x 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](#)

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 foJ-1 (on8(ol)-1 (l)-1 (egethe Foundati)-)-1 (ow)1c