Guidelines for Creating an

Equally Effective Alternative Access Plan (EEAAP)

# Purpose of the Equally Effective Alternate Access Plan

In compliance with California Government Code Section 11135 and Section 508 of the Rehabilitation Act of 1973, the University must apply accessibility standards to Electronic and Information Technology (EIT) products and services that it buys, creates, uses and maintains. When systems, software or processes do not meet requirements of Section 508, an alternative access plan must be developed to address the accessibility issue. This form is used to describe the alternate access plan. Plan approval from the [Campus executive responsible for EI&T approvals vary from campus to campus] is required before the procurement can commence.

# EEAAP Creation Guidelines

An EEAAP should be prepared for products and services that are not fully Section 508/WCAG 2.0 compliant. Refer to the [ATI Prioritization Framework](http://ati.calstate.edu/file.php/1/Campus_Plan/ATI_Prioritization_Framework_v1.docx) as stated in the Coded Memo for more details regarding the prioritization process. The creation of an EEAAP is especially important for high-impact products/services including those that meet any of the following criteria:

* Product will be made available to the general public, large groups of students, faculty or staff.
* Product will be used for an important administration or class function.
* Product is a component of a class(es), or has been approved to be purchased through the exemption/exception process.

No EEAAP is required when the product/service is fully accessible or the impact of the product/service is determined to be low ([ATI Prioritization Framework](http://ati.calstate.edu/file.php/1/Campus_Plan/ATI_Prioritization_Framework_v1.docx)).

# EEAAP Committee Membership

An EEAAP should be created by a multi-disciplinary committee that has a clear understanding of how the product/service will be used, what accessibility features and gaps are present in the product/service, and what resources and strategies should be deployed to ensure comparable access for persons with disabilities.

The following individuals should be part of the committee:

* **Representative from the department purchasing the product/service** – this department is generally responsible for product support and often where end users will go for assistance.
* **Representative from Services for Students with Disabilities** – this department generally oversees the student’s accommodation plan and has specialized knowledge of disabilities to assist students with accessibility issues.
* **The ATI Specialist or Designee** – this person has a broad overview of the purchase and where the accessibility gaps are based on the accessibility documentation provided by the vendor.

The committee should also take into consideration the following resources/representatives:

* Campus Information Technology Consultant –provides technical expertise to the group.
* Campus Affirmative Action Officer—assists with faculty and staff accommodations.
* Dean/Manager/Supervisor – signs as administrative approval for the EEAAP. Has knowledge of resources available to support accessibility.
* Procurement Services –serves as an authoritative resource for all procurement-related activities and processes.
* Instructional Materials Specialist – provides expertise and assistance regarding the accessibility of curricular materials.
* Web Accessibility Specialist – provides expertise in web-related accessibility issues.
* Human Resources (HR) – serves as authoritative resource for faculty and staff related processes.
* ADA Compliance Officer – Assists in faculty and staff accommodations.

# EEAAP Documentation Procedures

As EEAAP documentation is created, campuses should ensure that key constituent groups (e.g. Services for Students with Disabilities) are able to quickly and easily access these plans in order to (1) initiate the accommodations and workarounds outlined in the EEAAPs; (2) easily allow updating of current EEAAPs based on product improvements or when a new approach is developed; and (3) streamline the authoring of future EEAAPs. In addition, EEAAPs should be reviewed at least once per year, usually coinciding with the renewal of the product.

There are 2 potential methods for providing access to this documentation:

1. Centralized
   * Establish and maintain a central document repository (e.g. SharePoint)
   * Provide access for all EEAAP Committee members and key constituent groups (e.g. Services for Students with Disabilities)
2. Distributed
   * Store the signed original EEAAP with the purchasing department
   * Distribute copies to the following departments:
     + Procurement office (filed with the requisition)
     + The ATI Specialist or Designee
     + Services for Students with Disabilities (accommodations for students)
     + Human Resources (accommodations for staff and faculty)