# Temporary Alternative Access Plan (TAAP)

***Formerly, Equally Effective Alternative Access Plan (EEAAP).***

[Instructions on completing this document](#Instructions) are in the final four pages, which should be removed after completion.

## ICT Product Information

Name:

Version:

Vendor Contact:

Temporary Alternate Access Plan Creation Date:

### Referenced Documentation

Upload the referenced documents to the [ATI Systemwide ACR Repository (SharePoint Login Credentials Required)](https://thecsu.sharepoint.com/sites/CSU-VPATDocumentation). Create a product folder for the ICT if one does not already exist. Once uploaded, generate links and place them below:

* ProductAccessibility Conformance Report (ACR) link, if applicable
* Vendor Accessibility Demonstration Results link, if applicable
* Manual or Automated Testing Results: link, if applicable
* Vendor Accessibility Roadmap: link, if applicable

## Known Accessibility Barriers

**Describe the known accessibility barriers that affect core functionality.** This box will expand. If pasting content, paste it as plain text to maintain box formatting.

### Affected User Groups

Choose all that apply.

* Blindness
* Low Vision
* Deafness
* Hard of Hearing
* Limited Manual Dexterity
* Cognitive Disability
* Speech Disabilities
* Photosensitivity
* Limited Reach and Strength

## Proposed Alternative

Please provide details on the proposed alternative solution.

**Describe how the proposed alternative will address the barrier(s), describe the resources required or personnel, and name the responsible department.** This box will expand. If pasting content, paste it as plain text to maintain box formatting.

## Accessibility Statement

Create a brief accessibility statement outlining the following:

* Known barriers in the product interface.
* Impacted disability groups.
* Link or reference to this document.
* Add a disclaimer: best effort was made, but unknown barriers may remain.
* Provide contact for further accessibility assistance.

*(Post this statement wherever the product is available and in use).*

This box will expand. Provide a copy of the accessibility statement here. This box will expand. If pasting content, paste it as plain text to maintain box formatting.

## Communication and Distribution

The document must be easily referenced. Indicate which of the following actions have been taken:

* Posted the Accessibility Statement in course syllabi (if applicable).
* Posted the Accessibility Statement where the product is accessed.
* Provided copies of this document to Requesting Department/Area.
* Provided copies of this document to Disability Services Office.
* Provided copies of this document to Human Resources (ADA Coordinators).
* Provided copies of this document to IT Help Desk.
* Saved the document in the [ATI Systemwide ACR Repository (SharePoint Login Credentials Required)](https://thecsu.sharepoint.com/sites/CSU-VPATDocumentation)
* Other: [Specify]

## Quality and Risk Assessment

Review the proposed solution to determine if it meets the following legal requirements to be equally effective. A non-equal alternative or individualized accommodation will be required if it does not.

### Requirements Checklist

To qualify as an Equally Effective Alternative, the plan must meet **ALL** the following:

* Allows access to the same information, engagement, and services
* Offers the same availability as the primary solution
* Can be accessed independently without additional assistance
* Does not result in disparate burden or impact on the user
* Has substantially equivalent ease of use
* Protects the privacy of the individuals affected

### Process Outcome

Based on the assessment above, the outcome of the Temporary Alternate Access Plan is:

* **Meets all six legal requirements: Equally Effective.** The proposed solution fully meets all legal requirements for equally effective access, presenting minimal risk to the institution. In general, no individual accommodations are expected to be necessary. Non-conforming minimal impact on access.
* **Meets some (1-5) legal requirements: Partially Equally Effective.** While the solution partially addresses accessibility, it may still require supplemental assistance for users. This carries a moderate risk to the institution, and staff should be prepared to provide additional support for affected individuals.
* **Unable to provide alternative means of access: Need for Individualized Accommodation.** If no effective alternative solution is available, individualized accommodations must be provided for each affected user. This requires alerting the disability services and human resources offices. **The department responsible for obtaining the product may face additional costs to cover individualized accommodations,** and this scenario presents a high risk to the institution.

### Institutional Risk

* **HIGH:** No alternative access provided (Supports 0 criteria)
* **MODERATE:** Non-Equal Alternative Access (Supports 1-5 criteria)
* **LOW:** Equally Effective Alternative Access (Supports all 6 criteria)

### Accommodation Requirements

* **HIGH:** Accommodations required for all users (Supports 0 criteria)
* **MODERATE:** Accommodations required for some users (Supports 1-5 criteria)
* **LOW:** Accommodations required for minimal number of users (Supports all 6 criteria)

## Administrative Approval

By signing below, each approver confirms that they have reviewed the proposed temporary alternative means of access, evaluated the associated institutional risks and accommodation requirements, and determined that this plan serves as an acceptable interim solution for meeting applicable compliance and legal obligations.

|  |  |  |  |
| --- | --- | --- | --- |
| Role | Name | Signature | Date |
| Department Chair/Manager |  |  |  |
| Dean/Division Vice President |  |  |  |
| ADA Compliance Officer |  |  |  |

### Next Review

The document should be reviewed and updated annually or when renewing the ICT, as TAAPs are temporary solutions until the vendor resolves accessibility issues.

Review of this document should occur on or before [insert date]

#### In the event of Vendor Non-Compliance

TAAPs are intended to be temporary and are only valid when regularly reviewed to confirm that the vendor is actively working to remediate their ICT accessibility barriers.

If this document is under review and there is no measurable progress from the vendor, its continued validity may be questioned. Should there be no improvement at the time of the annual review, a formal memo must be prepared for the requesting department and signed by the institution’s highest executive leadership.

This memo should state that the vendor has failed to meet its commitment to address the known accessibility barriers in its product. It should also explain why an alternative solution is not being pursued at this time.

A copy of this memo may be shared with the vendor.

This process should be repeated annually for as long as the institution continues to accept the associated high risk.

## Miscellaneous Notes

This box will expand. If pasting content, paste it as plain text to maintain box formatting.

## Notice to all Parties

The Temporary Alternate Access Plan should only serve as an interim measure while the vendors address the underlying barriers to full accessibility. As of April 24, 2026, Title II of the ADA requires all ICT (Information and Communication Technology) to be fully accessible. In most circumstances, Title II §35.205 also applies.

While we may not yet meet every technical standard, we will use TAAPs to comply with §35.205, which deems that a public entity not in full compliance with §35.200(b) is still considered compliant if the noncompliance has minimal impact on access and does not prevent individuals with disabilities from:

* Accessing the same information as individuals without disabilities;
* Engaging in the same interactions as individuals without disabilities;
* Conducting the same transactions as individuals without disabilities; and
* Otherwise participating in or benefiting from the same services, programs, and activities as individuals without disabilities.

Our goal is 100% compliance, and we will rely on TAAPs only until these barriers are fully resolved.

### Legal Framework

* [Section 504 of the Rehabilitation Act of 1973](https://www.federalregister.gov/documents/2012/03/14/2012-6122/discrimination-on-the-basis-of-disability-in-federally-assisted-programs-and-activities) and [Section 508 of the Rehabilitation Act of 1973](https://www.section508.gov/manage/laws-and-policies/section-508-law/)
* [Americans with Disabilities Act Title II Regulations](https://www.ada.gov/law-and-regs/regulations/title-ii-2010-regulations/)
* [California Government Code 11135](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=11135.) and [California Government Code 7405](https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=7.&title=1.&part=&chapter=18.1.&article=)
* [Access Board E202.7.2 Alternative Means](https://www.access-board.gov/ict/#E202.7.2)

## Instructions for Temporary Alternative Access Plan Creation

### Remove this Section

Remove the final four pages of instructions before finalizing this document.

### Customize with Care

Campuses may adapt this framework to create their versions of the form, provided they retain its core elements. In addition, the “Notice to All Parties” section must be included in the finalized Temporary Alternate Access Plan document.

A TAAP is only necessary when accessibility barriers in ICT products are severe enough to prevent users from performing essential functions; minor WCAG failures that do not prohibit core functionality do not require this process. Barriers are identified through a critical review of vendor accessibility conformance documentation, vendor accessibility demonstrations, or campus manual and automated testing.

The Temporary Alternate Access Plan leads to one of three outcomes:

1. **Equally Effective**: Delivers an equivalent alternative solution that ensures equal timeliness and availability, offering the same level of independence in access. It guarantees no loss of functionality or additional restrictions, preserving the same outcomes, user experience, and privacy as the original solution.
2. **A Non-Equal Alternative**: While functional, it is not ideal. It may impose limitations on users over the original solution and may still require individualized accommodations for some users under specific circumstances.
3. **Referral for Individualized Accommodation**: When no viable alternatives are available, personalized solutions are developed and provided on a case-by-case basis.

The value of this process lies in its ability to determine the most effective method for supporting users affected by inaccessible Information and Communication Technology (ICT).

## Documenting Known Accessibility Barriers

This section identifies known accessibility barriers and the users affected by them. This information is gathered from multiple sources, including vendor accessibility conformance documentation (VPATs, HECVATs, and WCAG statements), vendor product accessibility demonstrations, and manual ICT interface reviews.

Accuracy is critical, as the entire process relies on the validity of this information. If vendor documentation is incomplete or unreliable, conducting a product accessibility demonstration can help verify key accessibility claims by walking through the core functions of the product. This approach is a more efficient use of resources and significantly less time-intensive than a full manual interface review.

## Proposing an Alternative

Recommended Alternative for Users Impacted by Known Barriers

When barriers to an ICT product are identified, the recommended course of action is to provide a clear alternative that achieves the same objectives. To ensure its effectiveness:

1. Identify End-User Needs
   1. Begin by consulting the individual responsible for purchasing the ICT product. Their insights into the product’s intended use and desired outcomes will help pinpoint suitable alternatives.
2. Collaborate and Consult
   1. Work together to evaluate viable solutions that meet the same goals for the end users.
   2. If additional guidance is needed, IT personnel and Disability Support Services should be involved in refining and validating the chosen alternative.
3. Provide Campus-Specific Information
   1. Clearly outline how end users will engage with the alternative (e.g., accessing a different website, using specific software, or following a particular process).
   2. Detail any resources—staffing, technology, training—necessary for implementing and maintaining the alternative.
   3. Include campus- or unit-specific contacts (names, phone numbers, email addresses) who can assist users, along with preferred communication methods and availability times.

By incorporating these steps, you ensure that users affected by existing barriers have a well-defined, accessible pathway to achieve their objectives.

## Creating an Accessibility Statement

As you develop your alternative solution, create an accessibility statement that proactively informs users about any known barriers and the availability of an alternative. This statement helps reduce frustration by preventing unexpected obstacles and minimizing wasted time and effort. Be sure to include the following components in your accessibility statement:

* Known barriers in the product interface.
* Impacted disability groups.
* Reference the existence of an alternative access plan.
* Add a disclaimer: best effort was made, but unknown barriers may remain.
* Provide contact for further accessibility assistance.

## Plan for Communication and Distribution

A Temporary Alternate Access Plan is only effective if the people who need it know it exists. To maximize its impact, share the plan widely—especially with faculty, staff, and departments that directly support students, such as disability services and accommodation teams. Clear communication ensures that those who rely on the plan can readily access its resources and guidance.

Make sure the following individuals are informed about the Temporary Alternate Access Plan, including its purpose, how to implement it, and where to seek help:

* Posted the Accessibility Statement in course syllabi (if applicable).
* Posted the Accessibility Statement where the product is accessed.
* Provided copies of this document to Requesting Department/Area.
* Provided copies of this document to Disability Services Office.
* Provided copies of this document to Human Resources (ADA Coordinators).
* Provided copies of this document to IT Help Desk.
* Saved the document in the [ATI Systemwide ACR Repository](https://thecsu.sharepoint.com/sites/CSU-VPATDocumentation).
* Other: [Specify]

## Refrain from sharing the document on publicly accessible platforms—such as your institution’s main website—unless campus credentials protect access. This helps maintain privacy and ensures that only authorized individuals can view the plan.

## Conducting a Quality and Risk Assessment

As discussed, this process has three potential outcomes. To determine which one applies, evaluate your solution against the six Equally Effective Alternate Access Plan (EEAAP) requirements listed below. Only a solution that meets all six criteria qualifies as an EEAAP. After completing the evaluation, select the corresponding outcome from the process options.

It is crucial to identify which category the proposed temporary alternative access falls into, as this helps the institution assess associated risks and clarify who is responsible for ensuring proper implementation. If not an EEAAP, it may be a Non-Equal Alternative or Need for Individualized Accommodation.

### Requirements Checklist

To qualify as an Equally Effective Alternative, the plan must meet **ALL** of the following:

* Allows access to the same information, engagement, and services
* Offers the same availability as the primary solution
* Can be accessed independently without additional assistance
* Does not result in disparate burden or impact on the user
* Has substantially equivalent ease of use
* Protects the privacy of the individuals affected

### Process Outcome

Based on the assessment above, the outcome of the Temporary Alternate Access Plan is:

* **Meets all six legal requirements: Equally Effective Alternative Access (EEAAP).** The proposed solution fully meets all legal requirements for equally effective access, presenting minimal risk to the institution. In general, no individual accommodations are expected to be necessary. Non-conforming minimal impact on access.
* **Meets some (1-4) legal requirements: Non-Equal Alternative.** While the solution partially addresses accessibility, it may still require supplemental assistance for users. This carries a moderate risk to the institution, and staff should be prepared to provide additional support for affected individuals.
* **Unable to provide alternative means of access: Need for Individualized Accommodation.** If no effective alternative solution is available, individualized accommodations must be provided for each affected user. This requires alerting the disability services and human resources offices. The department responsible for obtaining the product may face additional costs to cover individualized accommodations, and this scenario presents a high risk to the institution.

**Any costs associated with individualized accommodations should be covered by the department, college, or unit utilizing the ICT with known accessibility barriers.**

### Annual Review

The document must be reviewed and updated annually or when renewing the ICT, as TAAPs are temporary solutions until the vendor resolves accessibility issues.

#### In the event of Vendor Non-Compliance

TAAPs are intended to be temporary and are only valid when regularly reviewed to confirm that the vendor is actively working to remediate their ICT accessibility barriers.

If this document is under review and there is no measurable progress from the vendor, its continued validity may be questioned. Should there be no improvement at the time of the annual review, a formal memo must be prepared for the requesting department and signed by the institution’s highest executive leadership.

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