AUDIOVISUAL CAPTIONING POLICY

I.   <u>Policy Section</u>

      3.0 College Operations

II.   <u>Policy Subsection</u>

      3.8 Audiovisual Captioning Policy

III.   <u>Policy Statement</u>

      All audiovisual media used as part of classroom activities, instruction, distance learning, training modules for institution personnel, campus sponsored events, and co-curricular activities should include either closed, open, real time captions, interactive transcription, or subtitles, whichever is appropriate.

IV.   <u>Reason for the Policy</u>

      The Americans with Disabilities Act requires GRCC to ensure access to equal and effective communication for all students, staff, and community members.

      In addition, this policy would:

- Ensure compliance with federal law.
- Benefit individuals who are deaf or hard of hearing who must have captioned media.
- Support an inclusive environment geared towards universal design.
- Benefit individuals with learning differences, ADD/ADHD, or cognitive limitations.
- Benefit persons learning English as a second language.
- Benefit persons who see GRCC-produced media productions.
- Benefit individuals without disabilities who have stated that captioning helps in taking notes and improves understanding and recall.
- Benefit anyone in the audience when variations of sound quality or surrounding noise cause distractions.

V.   <u>Entities Affected by this Policy</u>
      All GRCC faculty, staff, students, and community members

VI.   <u>Who Should Read this Policy</u>
      All GRCC faculty, staff, and students

VII.   Related Documents

1. Caption Information Hub
   http://www.grcc.edu/caption

2. Captioning Request Form
   www.grcc.edu/captionform

3. Grand Rapids Community College Copyright Policy
   https://www.grcc.edu/sites/default/files/docs/policies/3-0_copyright.pdf

4. Copyright Subject Guide
   http://subjectguides.grcc.edu/copyright

5. Distance Learning and Instructional Technologies – Blackboard and Accessibility
   http://www.grcc.edu/distancelearningandinstructionaltechnologies/instructionaltechnologies

6. Copyright Permission Request For Closed Captioning of Media/Online Materials form
   http://www.grcc.edu/officeofaccessibility/resources/facultystaffresources

7. U.S. Department of Justice Civil Rights Division Disability Rights Section – Title II Highlights
   http://www.ada.gov/t2hlt95.htm

8. U.S. Department of Justice Civil Rights Division Disability Rights Section- Effective Communication
   http://www.ada.gov/effective-comm.htm

9. Office of General Counsel Americans with Disabilities Act Resources

VIII.   Contacts

Director of EO Compliance
General Counsel
Media Caption Technician
GRCC Library Liaisons Updated List By Department

IX.   Definitions

Audiovisual Media: defined as any visual material with sound, images, and/or spoken words used in any part of a course, training module, or event at GRCC.

Captions: A transcription of dialogue and sounds in audiovisual media. Captions appear as words on the screen that describe what is being heard or said. Captions include speaker differentiation and descriptions of background audio and relevant sounds. Captions come in two forms: open and closed. Closed captions can be turned off at the viewer's discretion, whereas open captions cannot be turned off.

Real-Time Captioning: Real-time captions or Computer Assisted Real-time Translation (CART), are created as an event takes place. Requires a professional captioner to have access, in-person or remotely, to a classroom lecture or other live event in order to produce an exact or conceptual transcript of the live presentation.

Subtitles: A translation of dialogue in audiovisual media; subtitles assume that the viewer can hear the words and sounds, and are often used to translate the audiovisual media into a different language.

Interactive Transcription: A time-synchronized transcript that highlights or underlines words as they are being spoken in the audiovisual media. Users can search the transcript and navigate to an exact point in the media by clicking on any word. GRCC considers audiovisual media with an interactive or simultaneous transcript as an accepted alternative to open or closed captions and subtitles of video content.

X.   Procedures

All audiovisual media utilized, created, purchased, and/or rented will be captioned as defined by the Audiovisual Captioning Policy Guidelines. Please use **Copyright Permission Request for Closed Captioning of Media/Online Materials form** for more information.

Individuals seeking to have materials captioned should utilize the captioning request form found at: https://www.grcc.edu/caption. The notification process for adding captions to media includes the following steps:
1. Once a faculty member submits a request, they will receive confirmation of the request within two business days. Faculty members with students currently needing a captioning accommodation will be given priority.
2. A second notice will be sent to the requestor after the project has been completed.

Captioning Required: Compliance with federal law requires captioning of all created, purchased, continually used, or publicly available audiovisual media productions shown at GRCC, regardless of whether the audience contains an individual with a captioning need.

1. **Purchasing New Audiovisual Media**

   Audiovisual media purchased or otherwise procured by a department or school after August 2016 must be the captioned version or a version equipped with subtitles. If that is not possible, prior to purchasing this content, the faculty member should make a good faith effort to obtain the publisher's permission to caption the video. The faculty member should also request the transcript.

2. **Creating Audiovisual Media**

   If any audiovisual media is newly created and will be continually used, the individual showing the video will need to take necessary steps to ensure that the media is captioned.

3. **Continually Utilized Audiovisual Media**

   If any audiovisual media will be consistently used, the individual(s) showing the material will need to take necessary steps to ensure media is captioned.

   If external media is already captioned, faculty should review captioning to ensure accuracy (particularly YouTube videos where captions have been auto-generated). If external media is not captioned, then copyright permission to caption must be obtained or attempted in good faith.

4. **Public material**

   If an audiovisual media production is made available to an unrestricted audience in which it is impossible for GRCC to know whether an individual accessing the material is a person who is deaf or hard of hearing, captioning is required. If material existed prior to January 2016, then it will be prioritized for captioning according to consistent use and the general public may request captioning when needed more immediately. If the production is an event that the general public may attend, an offer to accommodate those individuals with captioning needs must be extended during the marketing of the event.

Captioning Advised: There are a few exceptions where captioning may be postponed temporarily or not immediately required due to the determining factors listed below:

1. **Currently Owned Non-captioned Video/DVD/Film Releases**
   Non-captioned audiovisual media utilized prior to July 2014 should be transitioned out as new versions are purchased. If a request for an accommodation is received, any non-captioned media will need to be immediately captioned.

2. **Classroom Projects/Student-Produced Media**
   Student-produced media for distribution to a defined audience is strongly advised but not required in instances where no one has been identified as needing the accommodation. However in the event that a presentation will be distributed to a wider audience than the class, media will need to be captioned.

Captioning May Not Be Required: In very limited circumstances, captioning is not required.

1. **Impromptu Classroom Materials**
   The College understands the desire to enhance learning with current events or a topic that could not have been prepared for ahead of time. Every effort must be made to seek a captioned version of the video or clip.
   a. If there is a known audience member with a captioning accommodation:
      i. Seek an alternative video/clip/film with closed-captioning;
      ii. If no alternative is available, contact Disability Support Services prior to showing the video/clip/film to consider alternative options available.
   b. If no known audience member with a captioning accommodation:
      i. Captioning is not required for that specific showing of impromptu materials if the production will only be used for a very limited duration (i.e. one class period).

2. **Foreign Language courses**. English language captioning is also not required in courses where foreign language or comprehension and recall of spoken word would be negated by the addition of these captions (i.e. If the objective of an assignment is to have students watch a Spanish speaking movie and assess comprehension based on Spanish listening

skills, providing written captioning for the movie would eliminate the ability of a faculty member to know whether reading skills or listening skills were being assessed.)

However, if subtitles in the germane language are available, and they do not circumvent course objectives and may enhance the learning experience, they are encouraged.

Remediation

If a member of the GRCC community is found to not be in compliance with the Audiovisual Captioning Policy, the Director of Equal Opportunity Compliance will then contact and work with faculty and/or any contracted media company in conjunction with the Media Technologies Department in a timely manner to bring media into compliance.

When audiovisual media cannot be made accessible in a timely manner, the individual(s) found to not be in compliance will be responsible for providing alternative access to the information immediately. The Director of Equal Opportunity Compliance will follow up with the content owner(s) of the media to ensure understanding of the policy and proper training is administered, so future issues of this nature do not occur.

XI. Forms
Captioning Request Form: GRCC Instruction
www.grcc.edu/captionform

Copyright Permission Request for Closed Captioning of Online Media/Online Materials form
http://www.grcc.edu/officeofaccessibility/resources/facultystaffresources

XII. Effective Date
July 1, 2014

XIII. Policy History
AGC Approved- February, 2014
Revisions Approved- January 17, 2017
AGC Approved- January 21, 2020

XIV. Next Review/Revision Date
Next Review: 2022-2023