

AUDIOVISUAL CAPTIONING POLICY

I. Policy Section

3.0 College Operations

II. Policy Subsection

3.8 Audiovisual Captioning Policy

III. Policy Statement

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. Reason for the Policy

The Americans with Disabilities Act requires GRCC to ensure access to equal and effective communication for all students, staff, and community members. 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 disabilities, ADD/ADHD, or other cognitive impairments
- Benefit persons learning English as their second language benefit from the captions
- 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. Entities Affected by this Policy

All GRCC faculty, staff, students, and community members

VI. Who Should Read this Policy
All GRCC faculty, staff, and students

VII. Related Documents

1. [Caption Request Form](http://www.grcc.edu/caption)
<http://www.grcc.edu/caption>
2. [Grand Rapids Community College Copyright Policy](https://www.grcc.edu/sites/default/files/docs/policies/3-0_copyright.pdf)
https://www.grcc.edu/sites/default/files/docs/policies/3-0_copyright.pdf
3. [Copyright Subject Guide](http://subjectguides.grcc.edu/copyright)
<http://subjectguides.grcc.edu/copyright>
4. [Distance Learning and Instructional Technologies – Blackboard and Accessibility](http://www.grcc.edu/distancelearningandinstructionaltechnologies/teachingwithtechnology/blackboard6)
<http://www.grcc.edu/distancelearningandinstructionaltechnologies/teachingwithtechnology/blackboard6>
5. [Copyright Permission Request for Closed Captioning of Media/Online Materials form](http://www.grcc.edu/officeofaccessibility/resources/facultystaffresources)
<http://www.grcc.edu/officeofaccessibility/resources/facultystaffresources>
6. [U.S. Department of Justice Civil Rights Division Disability Rights Section – Title II Highlights](http://www.ada.gov/t2hlt95.htm)
<http://www.ada.gov/t2hlt95.htm>
7. [U.S. Department of Justice Civil Rights Division Disability Rights Section – Effective Communication](http://www.ada.gov/effective-comm.htm)
<http://www.ada.gov/effective-comm.htm>

VIII. Contacts

Director of Accessibility
General Counsel

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.

Open Captioning: captions cannot be turned off and on at the viewer's discretion.

Closed Captioning: captions can be turned off or on at the viewer's discretion.

Real-Time Captioning: Captions, composed of text, are used by people who are deaf or hard of hearing to access content delivered by spoken words and sounds. 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: words that appear on the screen that describe what is being said or heard in films, television programs, video games, etc. Subtitles may also include descriptions of background audio or other relevant sounds.

Interactive Transcription: searchable transcription provided side by side with audiovisual media which allows users to scroll through text as it is streaming. Users may scroll back and review the previous text on the computer.

GRCC considers audiovisual media with an interactive 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. If using any existing, legally obtained audio visual media currently owned or recorded from a broadcast, copyright permission to caption must be obtained or attempted in good faith. Audiovisual media may not be utilized unless it has been captioned and will not be captioned without received or good faith attempted contact for copyright permission without reply. Please use **Copyright Permission Request for Closed Captioning of Media/Online Materials form** 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 captioning created or existing media includes the following steps:

1. Requestors will receive notification of Prioritization or Clarification on the request (i.e. is the request in response to an accommodation need) within one business day.

2. A second notice will be sent to the requester after the project has been completed.

Captioning Required:

Captioning is required if a student, staff member, or community member who is deaf or hard of hearing is a known member of an audience in which audiovisual media is being presented.

Captioning is also required when:

- 1. Purchasing New Audiovisual Media/Instructional/DVD/Film**

Audiovisual media purchased by a department or school after policy implementation must be the captioned version or a version equipped with subtitles.

- 1. Creating Audiovisual Media**

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

- 2. Continually Utilized Audiovisual Media**

If any previously utilized audiovisual media will be consistently used going forward after policy implementation, the individual(s) showing the material will need to take necessary steps to obtain copyright permission and ensure that the media is captioned.

Essentially, if any audiovisual media will be used repeatedly in the future, even in cases where the audience is not known to have a member who self-identifies as deaf or hard of hearing, captioning is required.

Captioning Advised: Compliance with federal law requires captioning of all created, purchased or continually used audiovisual media productions shown at GRCC. There are however 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 policy implementation which can or will be transitioned out as new versions are purchased will not require immediate captioning. However, if a request for an accommodation is received applying to

a course or event where audiovisual media does not ensure access to equal and effective communication, any non-captioned media will then need to be captioned. Therefore, if there is a possibility of the media being used long term with no plans for transition or replacement with an accessible alternative, captioning is strongly advised.

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 on GRCC's network of outlets (i.e. GRCCtv, GRCC Today, etc.) media will need to be made accessible through our captioning process.

Regardless, 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 strongly advised.

**If this 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 Not Required: If an audiovisual production will only be used for a very limited duration (ie. One class period) in a restricted group in which there are no known audience members who are deaf or hard of hearing, captioning is not required.

1. Impromptu Classroom Materials

When utilizing audiovisual media in a classroom setting for the purposes of enhancing 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.

Necessary steps include:

- a. Seek an alternative video/clip/film with closed-captioning; or
- b. Offer an equally effective alternate assignment or video to a student that provides the same learning objectives. The student should be asked about whether they feel that the alternate assignment is fair before determining this option.
- c. If conditions a and b have been attempted without success and the video will only be utilized for a limited duration and the audience is restricted to a group of users known not to

need an accommodation, the material is not required to be captioned.

*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 Accessibility will then contact and work with faculty and/or any contracted media company in conjunction with the Media 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 Accessibility 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](https://www.grcc.edu/caption)

<https://www.grcc.edu/caption>

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

<http://www.grcc.edu/officeofaccessibility/resources/facultystaffresources>

XII. Effective Date

July 1, 2014

XIII. Policy History

AGC Approved-February, 2014

XIV. Next Review/Revision Date

16/17 Academic Year