

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.

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 disabilities, ADD/ADHD, or other cognitive impairments.
- 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. 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 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 Accessibility Resources
<http://www.grcc.edu/officeofaccessibility>

VIII. Contacts

Director of EO Compliance
General Counsel
Media Caption Technician

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 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 captioning created or existing 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

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

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, the faculty member should obtain or demonstrate the effort to obtain the publisher's permission to caption before purchase. Faculty should also request a 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 the media is delivered already captioned, faculty should review captioning to ensure accuracy (particularly YouTube videos that have been auto-captioned). If the media is not delivered captioned, then copyright permission to caption must be obtained or attempted in good faith.

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.

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, 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: 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:

5. 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.

6. 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 captioned.

Captioning May Not Be 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. 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 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

XIV. Next Review/Revision Date

Next Review: 2019-2020