

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 institutional personnel, campus-sponsored events, and co-curricular activities must include captions or equivalent text-based alternatives (e.g., closed captions, open captions, real-time captions, or similar text-based transcription), whichever is appropriate.

IV. Reason for the Policy

The Americans with Disabilities Act requires GRCC to ensure equal and effective communication for all students, employees, and members of the public. This policy establishes expectations for the use of captioning in audiovisual media to support compliance with federal law and to promote equitable access across instructional and institutional contexts. By emphasizing captioning as a standard practice, the policy supports an inclusive environment grounded in universal design and benefits a broad range of individuals, including those who are deaf or hard of hearing, individuals with learning or cognitive differences, multilingual learners, and others who may rely on visual access to information. Captioning also enhances comprehension and usability of content for the campus community more broadly.

V. Entities Affected by this Policy

All employees
Board of Trustees
Independent contractors
Applicants
Students
Vendors
College guests
Community and constituencies accessing services
Volunteers

Members of the public

VI. Who Should Read this Policy

All employees
Board of Trustees
Independent contractors
Applicants
Students
Vendors
College guests
Community and constituencies accessing services
Volunteers
Members of the public

VII. Related Documents

1. Closed-Captioning and Audio Description Support
<http://www.grcc.edu/caption>
2. Grand Rapids Community College Copyright Policy
https://www.grcc.edu/sites/default/files/docs/policy/3-00_Copyright_2023-11_ada.pdf
3. Copyright Subject Guide
<http://subjectguides.grcc.edu/copyright>
4. Distance Learning and Instructional Technologies – Course Design and Accessibility
<https://www.grcc.edu/faculty-staff/teaching-learning-distance-education/course-design-accessibility>
5. Americans with Disabilities Act Title II Regulations
<https://www.ada.gov/law-and-regs/regulations/title-ii-2010-regulations/>
6. U.S. Department of Justice, Civil Rights Division: Fact Sheet: New Rule on the Accessibility of Web Content and Mobile Apps Provided by State and Local Governments
<https://www.ada.gov/resources/2024-03-08-web-rule/>
7. U.S. Department of Justice: ADA Requirements: Effective Communication.
<https://www.ada.gov/resources/effective-communication/>
8. Accessibility Quick Guide Resources

VIII. Contacts

Director of Equal Opportunity Compliance and Title IX Coordinator
General Counsel
GRCC Media Technologies/Captioning Services

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

A. General Captioning Requirements

Audiovisual media used as part of the College's programs, services, or activities must be captioned or otherwise made accessible in accordance with this policy.

1. Use of Audiovisual Media

Audiovisual media must be captioned when it is used, displayed, or made available as part of the College's programs, services, or activities, regardless of when the media was created or acquired.

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 used repeatedly or on an ongoing basis, the individual(s) responsible for its use must ensure that the media is accurately 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 Materials

Audiovisual media made available to the public or an unrestricted audience must be captioned at the time it is posted or shared. If material existed prior to April 2026, 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.

B. Captioning Requirements for Existing and Student-Produced Audiovisual Media

Existing and student-produced audiovisual media are subject to the captioning requirements of this policy. The following provisions address

how those requirements apply to media already owned by the College and to audiovisual media created by students.

1. Currently Owned Non-captioned Video/DVD/Film Releases

Audiovisual media that is actively used for instruction, programming, or public access must be captioned. Departments should prioritize updating or replacing non-captioned media with accessible versions.

If captioning cannot be completed in advance of use, alternative access must be provided in a timely manner (e.g., transcripts or equivalent text-based alternatives), and steps must be taken to bring the media into compliance as soon as practicable.

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. If student-produced media is shared beyond the classroom or made available through College-sponsored platforms (e.g., GRCctv, GRCC Today, or other digital or public-facing channels), the media must be captioned prior to distribution.

C. Limited Exceptions to Captioning Requirements

The College recognizes that there may be limited circumstances in which captioning is not immediately required or may not be appropriate based on the nature and purpose of the audiovisual media. The following exceptions are intended to be applied narrowly.

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 and Listening Comprehension Activities

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.

D. Requesting Captioning and Audio Description Services

Individuals seeking captioning or audio description services should refer to the College's Closed-Captioning and Audio Description Support webpage for current request forms, procedures, resources, and contact information.

E. Remediation

When audiovisual media is identified as not meeting the requirements of this policy, the Director of Equal Opportunity Compliance will work with the responsible individual or department, and other appropriate College offices as needed, to bring the media into compliance in a timely manner.

If the media cannot be made accessible before it is needed, an appropriate alternative means of access must be provided. The Director of Equal Opportunity Compliance may also provide or coordinate guidance, resources, or training as appropriate to support future compliance.

XI. Forms

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

XII. Effective Date

April 24, 2026

XIII. Policy History

AGC Approved- February, 2014
Revisions Approved- January 17, 2017
Revisions Approved at AGC: April 14, 2026

- XIV. Next Review/Revision Date
Next Review: 2028-29