

Academic Governing Council
Decision Form
Audiovisual Captioning Policy, part of 3.0 College Operations

This form is to be used when the Academic Governing Council makes a decision on an issue. This form is sent to the Provost.

Decision: Audiovisual Captioning Policy, part of 3.0 College Operations

Proposed Policy:

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.

(Please see full policy language at the end of this form.)

Rationale:

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. By providing ease of access in addition to reasonable accommodations to qualified individuals with disabilities, GRCC remains committed to adhering to the requirements of Sections 504 & 508 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 as amended (2008).
- 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.
- Provide the most effective means of providing equal access to audiovisual media (including but not limited to videos, movie clips, DVDs, and films) through the use of products with open/closed-captioning or subtitles for individuals who are deaf or hard of hearing.

Supporting Data:

- This policy was developed using a team approach, with input from faculty, staff, and administration, as well as comments from teaching and non-teaching faculty

and discussion at AGC meetings in November 2013, December 2013, and February 2014.

In addition to Federal law requirements, see:

Graduation Rates:

- College graduation - 12.8% of the hearing population graduated from college whereas 5.1% of the deaf or hard-of-hearing population graduated.
(<http://research.gallaudet.edu/Demographics/deaf-employment-2011.pdf>)
- As compared to a 47% dropout rate for students without disabilities, the college dropout rate for students with hearing impairments is 71%.
(http://www.handsandvoices.org/articles/education/ed/V13-1_beyondHS.htm)

Legal Precedent:

- UC Berkley (1999), LaTrobe University (2008), Ohio State (2009), University of Kentucky (2011), Daytona State College (2011), University of Maryland at College Park (2013) all faced class action lawsuits from advocacy and special interest groups like the National Association for the Deaf for lack of accessibility in college resources including but not limited to: Course Content and Classroom Environments, Sporting Events and Entertainment; Safety, Emergency and any other Announcements
- National Association of the Deaf (NAD) vs. Netflix
-"...the court's determination that Netflix's streaming video service qualifies as a "*place of public accommodation*" extends the jurisdiction of the ADA to any organization that publishes video."

Implications for Action:

- Captioning in a given situation may be Required, Advised, or Not Required, as indicated in the full policy. This policy complies with a federal mandate to provide access to equal and effective communication for all students, staff, and community members.
- The purpose of this policy is to make the campus community aware of our responsibility, resources available to address shortcomings, and appropriate courses of action to take in select scenarios.
- Processes to support implementation include the Captioning Request Procedure, as well as professional development offered through the Center for Teaching Excellence and Distance Learning and Instructional Technologies:.
- Policies give us the ability to advocate for necessary and additional resources.
- AGC policies are customarily approved by the Provost with a grace period to establish procedure before implementation. There is always a transition period.

Evaluation Plan:

This academic policy should be reviewed again in Fall, 2017.

Date of Decision by AGC: February 11, 2014

Response from Provost:

The Provost endorses the Audiovisual Captioning Policy as approved by the AGC effective July 1, 2014.

The Accessibility Director will establish and communicate procedures no later than December 1, 2014. Full implementation is expected by September 1, 2015.

Patricia Tuganowski 6/18/14

AUDIOVISUAL CAPTIONING POLICY DRAFT

I. Policy Section

3.0 College Operations

II. Policy Subsection

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