SGOC Document

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Section: 2
Subject: Captioning & Accessibility Operating Procedure – SGOC Document

Date: September 2, 2022
Sponsoring Constituent(s): The Access and Accommodation Services Committee

Statement of the Issue:

- The purpose of this document is to recommend that captioning of recorded videos used for class instruction be adopted as operating procedure for all A-State Jonesboro academic programs. The adoption of this operating procedure would require institutional expense and possibly contracting with a third-party captioning provider. The approval of this procedure would ensure that those who are deaf or hearing impaired or those with other related challenges have equal access to class material. This procedure would also be advantageous for students without disabilities as there are many learning and processing benefits to captioned audio content.

Rationale for operating procedure:

- Arkansas State University’s administrators, faculty and staff are committed to providing a barrier free environment to every student who has the desire to learn and succeed in the collegiate environment. With this in mind, we have a responsibility to adhere to the requirements of Sections 504 and 508 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act and its amendments. This is to provide reasonable accommodations to qualified individuals with disabilities. As of fall 2022, Access and Accommodation Services had approximately 26 students registered with hearing impairments. Although Access and Accommodation Services (A&AS) works tirelessly to provide necessary accommodations to students with hearing impairments registered with the A&AS office, it is likely that there are students with hearing related struggles or other similar challenges who are not registered with the office as registration is not mandatory. In addition, the Proposal Subcommittee of the larger Access and Accommodation Services Committee, feels that it is important for the university to take an official stance regrading accessibility by requiring all courses and academic programs to provide captioned content. Further rationale for this request is as follows:

1. Students who may need captioned material as an accommodation are encouraged to register with Access and Accommodation Services (A&AS). A&AS works with faculty to provide the necessary accommodation, whether that be captioning, interpreters or another accommodation that would meet students' needs. However, a hearing disability or impairment may not be present at the beginning of the academic term or year. Acquiring a disability or realization of a disability condition can occur unexpectedly at any time in one's life. So, if captioning were already required for recorded content used for class instruction, those concerns would not have to be addressed from a reactive standpoint because the university would be proactive by already having this procedure in place.
2. The captioning process can take anywhere between 24 hours to a few days depending upon how much material one student needs captioned, the subject matter being discussed on video, etc. So, if a course is requiring video material and the student is not aware of this ahead of time, A&AS staff won't be given adequate notice to address the need. With the turnaround time being at least 24 hours (and this is for an experienced captionist), the student is missing important class content through no fault of their own because material was not accessible from the start. This can be the case for multiple students in multiple classes during one term.
3. With online learning becoming a reality for most institutions, including A-State, recorded lectures and videos are being utilized more often. We can troubleshoot a lot of accommodation and accessibility related concerns by already requiring those videos to be captioned.
4. While students with disabilities are encouraged to register with A&AS, they are not required to. So, there could be students in courses with hearing impairments that are not registered with A&AS. They may wear hearing aids, be proficient at lip reading, or have simply figured out how to do the best they can without asking for accommodations. That being said, these students could still greatly benefit from captioned material and would not have to work so hard to fully access and process information. While work to de-stigmatize disability and encourage people to seek the help that they need is on-going, the hope is that we work to make equitable access the norm so that accessibility is commonplace, whether students are registered with A&AS or not.
5. Captioning enhances access for all students. Students with learning and processing disorders often benefit from captioning because it allows them to access material in multiple formats (visual and audio). Captioning can also be beneficial to ESL students. In addition, captioning is beneficial to students without disabilities because it can allow them to access video material regardless of environmental factors.
6. Having all videos captioned is a major component of the concept of Universal Design, the philosophy that environments should be designed as accessible as possible to all people on the front-end so as to eliminate the need for individuals to request accommodations.

7. The university has accessibility standards in place for all public facing media (recruitment material, community outreach, promotional, press releases, etc.), and one of these standards is that all videos must be captioned. This proposed operating procedure would ensure that our educational and instructional videos are in line with the policy of Marketing and Communications.
8. All A-State Online courses follow standards that require captioning or video transcripts to meet accessibility guidelines. All videos are captioned and transcribed and available for students within AOS courses. Part of their course build (and rebuild) process for online programs is that every course has to meet a set of guidelines (one of which is a section on ADA compliance) and all courses are required to have media that is captioned/transcribed. If A-State were to adopt a captioning operating procedure, it would be in line with what A-State Online Programs is already doing.
9. The hope is that we don't just meet the bare minimum compliance requirement but set a standard beyond our legal obligation.
10. Setting captioning standards for content used in the classroom also sets a standard for further honoring the idea of disability as diversity. It will show that we honor the diversity of our student population by recognizing their needs and honoring their lived experience as a foundation of our university policies and not as an afterthought.

Type of review: Full

Other Pertinent Information:

Goal:

- The university's mission is to educate leaders, enhance intellectual growth and enrich lives. Students who are deaf or hearing impaired are leaders, in the present and in the future. Their intellectual growth is enhanced if they have full access to class material and instruction. Their lives as a part of the A-State community are enriched when they can fully participate in all academic programs and services. Their lives are also enriched when they can leave the university and fully immerse themselves into a vibrant workforce with confidence because their educational experience was equitable to their peers due to Arkansas State University's commitment to inclusion, equity and access. The goal of this captioning operating procedure is directly linked to A-State's university mission.

Implementation:

- It is most effective to use products with open or closed-captioning or subtitles, whether they are shown in class, assigned outside of class, or utilized for other university purposes. It is the responsibility of all colleges, departments, administrators, faculty and staff to utilize only media produced with open or closed captions or subtitles or provide an alternative format such as a transcript. When a video is shown in class, employees should ensure that captions are turned on, as doing so benefits all students.

New Video/DVD/Film Releases:

- It is the responsibility of the college/department, administrators, faculty and staff to:
    1. Purchase and use captioned videos/DVDs/films for teaching purposes in their assigned classroom and/or college/department or University-sponsored event;
    2. Substitute a video/DVD/film with captioning in the place of an older version without captioning;
    3. Update all video/DVD/film stock to include only those with captioning; and
    4. Create captions for any University-created video.

Non-captioned Video/DVD/Film Releases:

- It is the responsibility of the college/department, administrators, faculty and staff to:
    1. Transition their media materials into captioned and accessible products for all;
    2. Determine if the University or another entity has a captioned version;
    3. Seek an alternative video/DVD/film with closed-captioning;
    4. Make a determination if the video/DVD/film is essential to a course or if it may be deleted from a syllabus; or
    5. Offer an alternative assignment to a student in place of viewing a non-captioned video/DVD/film.

Alternative Accommodations for Non-Captioned Videos/DVDs/Films in Academic Courses:

- In the event the college/department, administrators, faculty or staff determine a non-captioned media product is essential to academic course requirements, it is the responsibility of the college/department, administrator, faculty or staff member to meet with the student who is hearing impaired/deaf to determine reasonable alternatives. Access and Accommodation Services staff can facilitate or be involved in that interactive process, if needed. A list of possible alternatives is shown below. This list is not all-inclusive:
    1. The individual’s American Sign Language (ASL) interpreter for that particular class will interpret the video/DVD/film, the ASL interpreter will review the media transcript, if available, and/or preview the video. ASL Interpreters must be informed at least two weeks in advance of the assignment.
    2. If a captioned video/DVD/film is not available, then the student who is hearing impaired/deaf and the ASL interpreter may be given a copy of the script at least two class meetings prior to the showing. If no ASL interpreter is assigned to the class because the student who is hearing impaired does not understand American Sign Language (ASL), such a student may depend on speech/lip reading and/or the use of an Assistive Listening Device (ALD). In such a situation, when captioning is not available, a transcript of the video should be made available to the student at least two class meetings prior to the showing. It is the responsibility of the instructor to contact the publisher to obtain a copy of the transcript. If a transcript is not available through the publisher, Access and Accommodation Services staff will work with faculty to provide a transcript if given at least two-weeks’ notice.

3. The instructor may offer an alternative assignment to the student in place of viewing a non-captioned video/DVD/film. Alternative assignments should be determined on an individual basis between the professor and the student who is hearing impaired/deaf. Access and Accommodations staff is available for consultation, if needed. Possible alternatives could include but are not limited to:
    - Providing in-depth copies of the instructor's notes on the video/DVD/film to ensure the student is given full access to the main points of the media presentation.
    - Allowing the student who is hearing impaired to view the video/DVD/film additional times on their own personal time with a copy of the instructor's notes.
4. Faculty must note in their syllabus any instructional material or assignments that will involve videos/DVDs/films that are not captioned or for which a transcript cannot be made available. This will allow for adequate notice that a discussion about alternate accommodations will be needed for a particular assignment.

The Role of Access and Accommodation Services (A&AS):

- Access and Accommodation Services' Technology Specialist (and one part-time support staff) will provide captioning services for short videos (1 hour or less) provided the material is given to staff in a timely manner (at least 2 weeks in advance). Longer video content should be outsourced to a contracted captioning service. Further, if faculty have more than 3-5 video lectures per course that are 1 hour or less, the captioning service must be outsourced. A&AS will cover the cost of captioning services through an account maintained for such accommodations. Turnaround time for captioning done by A&AS staff is approximately the week before content will be covered in class. If outsourcing is needed, the account for content in need of captioning will be maintained by A&AS. Videos will be uploaded, and returned to the necessary parties as timely as possible. Examples of captioning services include REV or Cielo24, two third party companies who specialize in captioning and transcribing video and live content. Information for both services will be provided below as a reference regarding cost, turnaround time, accuracy of captioned content, etc. These companies are simply detailed as a reference point but any captioning service that is cost-effective, has reasonable turnaround times and a high level of captioning accuracy would suffice.
- Priority regarding captioning is given to classes that have or will soon have a deaf or hearing-impaired student enrolled.
- If captions on existing materials is needed in a time-frame earlier than what A&AS or third-party captioning can provide, the department/unit will be given resources to have it captioned by an outside company at the department's expense.
- It is the responsibility of A&AS to determine reasonable accommodations, auxiliary aids and services based upon documentation presented by the individual and/or information gathered from an intake session and other assessment. A&AS provides accommodations for eligible students who are hearing impaired/deaf. Below is a list of some standard accommodations. This list is not all-inclusive.

1. Provision of auxiliary aids;
2. Assistance in locating a peer note-taker;
3. Assignment of a qualified American Sign Language (ASL) interpreter.
    - A&AS will inform professors and instructors when a student who is hearing impaired/deaf will have an interpreter present in their classroom. Notification generally will be provided within three work days of A&AS receiving a finalized schedule; timely notification is dependent upon voluntary disclosure by the student.
4. A&AS, in collaboration with the Faculty Support Center, will also provide the University community with general informational materials regarding:
    - Captioned videos and accessible media
    - Working with a hearing impaired/deaf individual & interpreter

Cost:

- If short form videos are captioned through A&AS, the cost of services will simply be funds provided by the university to Access and Accommodation Services to hire a qualified part time employee to assist the Technology Specialist in captioning videos. If faculty need captioning services for more than 3-5 hour long videos per course or any videos that are longer than one hour, those services should be outsourced to a third party. This will require a university contract with a third-party company to assist with getting captions completed and returned in a timely manner at the lowest cost possible. If outsourcing is needed, A&AS will cover the cost through an account maintained for such accommodations, and the account for content in need of captioning will be maintained by A&AS. Videos will be uploaded, and returned to the necessary parties as timely as possible. Detailed information regarding two reputable third-party service providers can be found below.
- All orders of third-party captioning services should be coordinated and tracked through A&AS and conform to Arkansas procurement law. A&AS will coordinate all agreements, regardless of whether they exceed the small procurements threshold, with A-State Procurement Services.

    Third-Party References (For Example Only)

    - CIELO24:
        - 99% accuracy
        - $1 per minute (the more captioning that is needed, this price decreases).
        - Turnaround time: As little as 2 hours but on average, less than 24 hours (cost of contract depends on expected turnaround time).
        - Standard university contracts are a 48 hour turn around.
    - REV:
        - 99% accuracy
        - $1.25 per minute

    - 24-hour turnaround time

Expected Outcome:

- If Arkansas State University adopts this phased in captioning operating procedure, the university will be setting a tone of inclusion, access and commitment to diversity. Adoption of this procedure will assert that the university is committed to providing equal access to all learners. The expected outcome is also retention of students who might otherwise fall through the cracks and will benefit from more equitable access to class material. In addition, another expected outcome would be increased enrollment due to Arkansas State University becoming more accessible and therefore a more viable option for parents and prospective students. Retention of students and an increase in the student population ultimately increases the university's financial gain as well.

Definitions:

- Open captioning is a process by which text is added to video or other media that is a written translation of the media's dialogue. Unlike closed captioning, open captions require no special decoding equipment for viewing on televisions or monitors and are always displayed and cannot be turned off.
- Closed captioning is a process where specifically encoded text is placed onto video or other media for the benefit of the hearing impaired. Normally invisible, closed captioning requires an internal decoder to be activated for viewing on the monitor/television.

**Adapted from The University of Texas at El Paso policy and University of Arkansas at Little Rock*

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