

MOTION ON CAPTIONING POLICY

Co-sponsored by Jess Cuculick, Charlotte Thoms, Dino Laury, and Carol Marchetti

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Charge

AAC Charge New 2/15/2018: Draft policy to require that all media for courses be captioned in accordance with guidelines provided by the Provost and the Department of Justice. Specify a process to address student concerns regarding captioned media. **And to consider implementation implications and edge cases (media heavy courses, assignment that includes viewing videos).**

- Draft policy to require captioning, following the outline of the Provost's guidelines (similar to the Submission of Grades Policy D5.0*, Section VIII, Paragraphs A and B) and address accuracy, synchronicity, completeness, and placement of captions. We recommend captions conform to the same guidelines as stipulated by the WCAG 2.0 level A and AA as required by the Department of Justice. (<https://www.w3.org/TR/WCAG20/>; <https://www.section508.gov/content/build/website-accessibility-improvement/WCAG-conformance>)
- Specify a process to address student concerns regarding captioning (similar to the Submission of Grades Policy D5.0*, Section VIII, Paragraph C)
- Address a mechanism to communicate policy with faculty members, including adjunct faculty members, guest lecturers, and invited speakers. (Faculty Employment Policies E4.0** or other appropriate policy)

*<https://www.rit.edu/academicaffairs/policiesmanual/d050>

**<https://www.rit.edu/academicaffairs/policiesmanual/e040>

Background

The Americans with Disabilities Act was signed into law in 1990. Under the ADA, it is required that educational and instructional videotapes be accessible to deaf and hard of hearing (DHH) students. Title II, which applies to all state and local government activities regardless of whether they receive Federal financial assistance, ensures that effective communication be provided regardless of the medium chosen. Multiple institutions have been sued by the Justice Department for the inaccessibility of its publicly available online course information and over Title III of ADA for the inaccessibility of online learning programs, websites, and other technologies. In 2015, Harvard and MIT (edX) were sued by the National Association of the Deaf for their failure to provide closed captioning in their online lectures, courses, podcasts and other online materials. By law, private universities are required to caption all course videos, even the ones that are available to the public for free.

Captions are not just required to be present, but to be accurate and providing a transcript of a recording is not an adequate substitute. According to the DeafTEC website,

On Feb 20, 2014 the FCC released a new ruling stipulating the post-production captioning be 99% accurate in order for viewers who rely on captions to “have a comparable viewing experience to those who can hear the audio portion of the programming.” To that end, the FCC addresses four components of captioning that lead to that 99% goal: accuracy, synchronicity, completeness, and placement. (<http://www.deaftec.org/captioning-standards>)

In 2015, Provost Haefner issued “Guidelines for Captioning Audio-Visual Media” and regularly emails faculty to remind them of these guidelines as well as the campus resources that provide captioning services.

(<https://www.rit.edu/academicaffairs/sites/rit.edu/academicaffairs/files/images/Captioning%20Guidelines%20rev.%202.15.pdf>)

In addition, the recently updated Section 508 of the Rehabilitation Act (January, 2017) requires conformance to the 12 guidelines of the Web Content Accessibility Guidelines WCAG 2.0 standards (<https://www.w3.org/WAI/intro/wcag.php>). As a result, all federally funded organizations have until January 18, 2018 to bring their websites and online content up to code with WCAG 2.0 Level A and AA requirements.

Dilemma

With the internet and YouTube, faculty can easily find videos to illustrate academic concepts and enrich their courses. The number of videos captioned by Teaching and Learning Services for use in RIT classrooms has grown tremendously. However, deaf students still regularly encounter uncaptioned videos as part of their courses – ask DHH students, sign language interpreters, or captionists and you’ll hear such stories often. But students in a course are often reluctant to speak up when uncaptioned videos are shown as they are concerned about upsetting the instructor, and it is outside the purview of interpreters or captionists, who are frequently asked to sign or caption the audio for these videos, to attempt to advocate for the students in these situations. In addition, the captioning that is provided in some videos is of poor quality – inaccurate, out of synch, poorly placed, etc. Although we have the comprehensive guidelines provided by the Provost, a search of RIT policy provides zero results regarding captioning.

Benefits of Captions

There are many potential benefits to providing captioned videos in addition to compliance with federal law. A 2016 study by Oregon State University¹ found that, in addition to accommodating for hearing loss, students use captions to help with focus, retaining information, overcoming poor audio and speaker accents, and language and vocabulary challenges.

A second study by Oregon State² indicates that the reasons that institutions implement comprehensive captioning policy include supporting the needs of all learners, creating a learning environment that is aligned with the mission of the institution, and because research supports a connection between caption use and positive learning outcomes.

¹Linder, K. (2016). *Student uses and perceptions of closed captions and transcripts: Results from a national study*. Corvallis, OR: Oregon State University Ecampus Research Unit.

²Linder, K. (2016). *Implementation of and solutions for closed captioning in U.S. institutions of higher education: Results from a national study*. Corvallis, OR: Oregon State University Ecampus Research Unit.

Support for this Motion from Provost Haefner:

From: [Jeremy Haefner](#)
To: [Carol Marchetti](#)
Cc: [Jessica Cuculick](#); [Dino Laury \(Lauria\)](#); [Charlotte Thoms](#)
Subject: Re: motion for Academic Senate on captioning
Date: Thursday, January 25, 2018 12:50:07 PM

Carol,

I LOVE IT! This should have been done years ago.

Jeremy

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Jeremy Haefner, Ph.D.
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From: Carol Marchetti <cemsma@rit.edu>
Date: Thursday, January 25, 2018 at 8:31 PM
To: Jere <jahpro@rit.edu>
Cc: Jessica Cuculick <jaln@ntid.rit.edu>, "Dino Laury (Lauria)" <djl@ntid.rit.edu>, Charlotte Thoms <cltnbt@ntid.rit.edu>
Subject: motion for Academic Senate on captioning

Hello Jeremy,

We wanted to inform you that, as senators, we are drafting a motion on captioning for the Academic Senate. Although you have issued extensive guidelines on captioning media, there is no official RIT policy. And students continue to encounter uncaptioned or poorly captioned videos in courses. We would like to see this issue addressed in policy (or at the very least, discussed on the floor of the senate and recorded in the minutes).

We attach our current draft of the motion to inform you of our intention and give you an opportunity to provide input.

Thank you,
Dino Laury
Jessica Cuculick
Charlotte Thoms
Carol Marchetti