

Shared Governance Proposal Review Process

Official Use Only

Proposal Name:

Date Received:

Is proposal a SGOC issue? Yes No

Responsible Committee:

Type of review:

Faculty Handbook Issue: Yes No

Staff Handbook Issue: Yes No

Constituency Groups: Faculty Senate

Chair's Council

Staff Senate

SGA

Dean's Council

GSC

	Expedited (7 Business Days)	Full (39 Business Days)	Extended (93 Business Days)
SGOC establish disposition		2 days	5 days
		Due by:	Due by:
SGOC forward to responsible committees and SGCs		2 days	5 days
		Due by:	Due by:
SGCs send comments to responsible committee		7 days	21 days
		Due by:	Due by:
Responsible committee prepares final draft and sends to SGOC		7 days	21 days
		Due by:	Due by:
SGOC sends final draft to constituency groups for final up/down vote		2 days	5 days
		Due by:	Due by:
Constituency groups vote and notify SGOC		7 days	21 days
		Due by:	Due by:
SGOC tally votes and sends final report		2 days	5 days
		Due by:	Due by:
Chancellor review and response		10 days	10 days
		Due by:	Due by:

Notes:

Final Status:

Date:

Captioning and Accessibility Operating Procedure

- I. Date: September 2, 2022
- II. Sponsoring Constituent (s): The Access and Accommodation Services Committee
- III. 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.
- IV. 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 regarding 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.

V. Type of review: Full

VI. Other Pertinent Information:

Goal:

- I. 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.

II. Implementation:

- a. 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.

III. New Video/DVD/Film Releases:

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

IV. Non-captioned Video/DVD/Film Releases:

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

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

- a. 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:
 - i. 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.
 - ii. 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.
 - iii. 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:
 - 1. 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.
 - 2. 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.
- b. 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.

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

- a. **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.

- b. **Priority regarding captioning is given to classes that have or will soon have a deaf or hearing-impaired student enrolled.**
- c. 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.
- d. 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.
 - i. Provision of auxiliary aids;
 - ii. Assistance in locating a peer note-taker;
 - iii. Assignment of a qualified American Sign Language (ASL) interpreter.
 - 1. 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.
- e. A&AS, in collaboration with the Faculty Support Center, will also provide the University community with general informational materials regarding:
 - i. Captioned videos and accessible media
 - ii. Working with a hearing impaired/deaf individual & interpreter

VII. Cost:

- a. 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.

- b. 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)

i. CIELO24:

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

ii. REV:

- 1. 99% accuracy
- 2. \$1.25 per minute
- 3. **24-hour turnaround time**

VIII. Expected Outcome:

- a. **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.

IX. Definitions:

- a. **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.

- b. **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*

Comments on SGOC Proposal regarding Captioning of Videos

1. How will this be done in Access and Accommodation Services since they are already understaffed? The proposal calls for an additional part-time staff member who will assist the full-time Computer Support Specialist with captioning needs. The full-time CSS is already budgeted for, and the part-time staff member will be paid out of the A&AS part-time account, when recruited. Captioning requests for a substantial number of videos or lengthy videos will be out-sourced to a third party. The system used to funnel videos to the third-party captioning company will be housed and maintained through A&AS.
2. How are they going to pay this person? The A&AS full-time Computer Support Specialist is budgeted for. They will oversee captioning services. The proposal also calls for a part-time captionist to assist the Computer Support Specialist in these efforts. A&AS has a part-time budget that this individual can be paid from. See above response and proposal regarding when third-party services will be used.
3. Do they have a budget line for this? A&AS full-time Computer Support Specialist is budgeted for. They will oversee captioning services. The proposal also calls for a part-time captionist to assist the Computer Support Specialist in these efforts. The part-time worker will be paid from the A&AS part-time account. In addition, A&AS has an account specifically for interpreting and captioning services.
4. The language in the proposal does need to be changed as there is currently no “media department” due to changes in staff. Library uses Kanopy service rental for older DVDs. **Noted. This can be updated as needed.**
5. Is there a statement we should have regarding this (i.e. in course syllabi)? **A statement can be added to the syllabus or added to the statement that already exists regarding request for accommodations, sharing that all video content for the class has captions or is going through the captioning process. Note: Some videos may already be captioned but it’s not common practice to turn them on, so this may need to be communicated to faculty and students as well.**
6. This could be a logistical nightmare with over 500 faculty on campus; PowerPoint, and videos for an entire course could be a lot of work and very tedious.
7. Could this be done incrementally? **That is the plan. A&AS is in talks with Legal regarding what a phased plan would look like.**
8. Should be providing this to all students. Students don’t have to identify as needing this service.
9. Is there a promise that the office will have the necessary resources to do this? **The A&AS full-time Computer Support Specialist is budgeted for. They will oversee captioning services. The proposal also calls for a part-time captionist to assist the Computer Support Specialist in these efforts. This person would be paid for through the A&AS part-time account. In addition, A&AS has an account specifically for interpreting and captioning services. See proposal regarding when third party captioning would be used.**

10. How are they going to pay for it? The A&AS Computer Support Specialist will oversee small captioning needs as laid out in the proposal. The proposal also calls for a part-time captionist to assist. Larger jobs will be out-sourced to a third party captioning service as outlined. A&AS has an account specifically for interpreting and captioning services.
11. How is this going to be staffed? The A&AS Computer Support Specialist will oversee small captioning needs as laid out in the proposal. The proposal also calls for a part-time captionist to assist. Larger jobs will be out-sourced to a third party captioning service as outlined. A&AS has an account specifically for interpreting and captioning services.
12. How are they going to prioritize which videos to caption first? Classes that have identified students enrolled who are deaf or hearing impaired will be prioritized first.
13. Has this proposal been vetted by Len Frye's office for cost? No. The proposal has been vetted and edited by Legal Counsel before being submitted to SGOC. A&AS is currently setting up meetings to discuss proposal with Finance and other stakeholders.
14. Will the turnaround time be good enough? The proposal asks for videos from faculty at least 2 weeks in advance. If captioning is done in-house (A&AS), the general turnaround time would likely be a week prior to when content will be covered, if material is received timely. If videos are outsourced, many companies ensure a turnaround time of 24-48 hours.
15. Will there help professors learn how to turn on CC' etc. on videos? Yes.
16. Can CETL help the professors? N/A
17. Is this going to be a logistical nightmare? This will certainly be a challenge, but we think worth undertaking as it creates more equity for various types of learners. Adopting these practices will also lessen possible legal compliance issues.
18. I do think generally speaking, that this is a good move, but especially with Applied Lessons and some studio classes, we listen to videos frequently with no captions in a casual sense. Do you think this practice will also need to be modified or perhaps just the more "official" use of videos in the classroom? Not certain of this. The adoption of this policy will require collaboration from all parties to determine how best to assist in applied or specialized courses.
19. How will the policy be enforced? How the policy will be enforced will be determined by A&AS, Legal, and other university administrators as the proposal moves forward. The hope is that the entire university community works together to encourage and enforce this policy as it creates more equity for learners.
20. I'm OK with this, but have two comments. If A-State is going to be charged for this service, then those charges should be sourced from the Division of Student Affairs (and definitely not Academic Affairs). We were faced with a similar situation when I was Chair down at Stephen F. Austin St. Univ. Internally, the dept. identified a zero-cost way to accomplish the intended goal by using the captioning tool within YouTube's platform. There was still the need to edit the captions because the technical terms that are inherent to science content were often wrong but, for general language use, YouTube's caption converter was more likely to be correct than other captioning services engaged by the university.
21. I appreciate the motivation of this proposal, and its need for students that are hearing impaired. I also appreciate that the motivation is to also make sure that our university is

in compliance. I do have the concern that professors may shy away from creative approaches to learning (i.e., elimination of multimedia, etc.) if this is required "all at once" and regardless of whether the class contains someone who is hearing impaired or not. A phased in approach "as needed" might make the transition more palatable to instructors."

22. Has this [proposal] been discussed at Dean's level regarding department expenses? There are significant financial implications if a blanket approach is used and departments do not have students with such needs in course sections. Who determines what sections are needed? **The proposal calls for all video content used for class instruction and A&AS will handle the cost by doing some of the work in-house and outsourcing larger projects. Payment for outsourcing will come out of an account A&AS has specifically for interpreting and captioning services. This would certainly require collaboration with upper administration, including Finance. A&AS is in the process of scheduling discussions with Finance to lay the groundwork for determining potential cost.**
23. We allow late registration, and apparently, students are not obliged to declare disabilities. This opens the door for last-minute requests/needs that can be expensive unless there is a cut-off point before which students declare any such issues. This has to be factored into any proposal for successfully implementing such schemes.
24. I am in agreement with both proposals. We already have to do the captioning for our courses. So, it is a good idea. I think lowering the admission requirements will allow students who may just be average (C) students to go to college. Many of those students think they are dumb and will not be successful. But, I have found that those are usually the ones who work the hardest to be successful. Just my thoughts.
25. Regarding the "closed captioning," I thought we already required all videos (even YouTube or Ted Talks), which are embedded in our online coursework, to be accompanied by captions. Isn't that part of the ADA compliant rules we already follow? If this is something different or more, I approve.
26. I'm in favor of captioning. We are going toward a more virtual-friendly environment and I believe captioning videos for f2f will become second nature for everyone as it has with our online courses.
27. The Department of Communication has no comments or questions for consideration.
28. There were no comments from the art + design faculty.
29. I think captioning is a good idea for all students, honestly. Not sure how the cost factor works out – probably not very well – but that should be incorporated into the cost of providing online content when online courses are offered.
30. I support this as long as the university provides the technology to caption videos. If it is labor intensive for faculty, then I would be less supportive.
31. I am in favor of this motion.
32. Requiring all recorded faculty presentations is overkill for 26 students out of 14K+ students and the cost will be very high to the university, impose further workload demands on all faculty, and increase faculty stress by adding another "learning curve" on top of the transition from Blackboard to Canvas on all faculty. Increasing costs when we have just taken a 24% cut in operating expenses is not financially responsible. This is

reasonable for the 26 students that need it and have approved accommodations, not for the entire institution.