



TO: Chief Executive Officers
Chief Instructional Officers
Chief Student Services Officers

FROM: Rebecca Ruan-O'Shaughnessy
Vice Chancellor, Educational Services and Support

RE: Updated Guidance on the Chancellor's Office's System Wide Prioritization for Real-time Captioning and Closed Caption Support

COVID-19 has disrupted face-to-face instruction at all institutions. Most classes in California Community Colleges have switched to online instruction into 2021. The state budget appropriates \$1 million annually to support captioning through the Distance Education Captioning and Transcription ("DECT") Grant. The DECT Grant is designed to supplement, not fully fund, efforts by colleges to provide captioning services. While prior funding for real-time captioning services within California Community Colleges was sufficient to meet demand, the requests for captioning statewide have increased by over 450% during the pandemic.

Given the scale of need without increase to the grant amount, the Chancellor's Office is adjusting its policy to ensure that the system continues to prioritize and support students with documented Academic Accommodation Plans ("AAP") who require captioning services. This memo provides that policy update on funding support priorities for real-time captioning and closed-caption services to ensure the system continues to prioritize and support students with disabilities during this crisis. Colleges should share this information with administrators, faculty, classified staff, and students.

Definitions

There are a number of different technologies available to make audio accessible to deaf and hard-of-hearing students. The National Deaf Center on Post-Secondary Outcomes describes them as follows:

- "Offline captioning" refers to captions that are added in the postproduction process. Offline captioning allows for the most accurate captioning possible.
- "Real-time captioning" refers to captions that are created in real-time while an event is taking place. Due to the nature of some events . . . some captions must be produced live. This type of captioning has a higher rate of errors and should be used only when offline captioning is not possible.
- "Speech-to-text" is an umbrella term used to describe an accommodation in which spoken communication and other auditory information are translated into text in real-

time. A service provider types what is heard and the text appears on a screen for the consumer to read.

- “Open captions” refers to captions that are part of the video image. They are always present and cannot be turned off.
- “Closed captions” refers to captions that are encoded in the video signal. They can be turned on or off.

(“Why Captions Provide Equal Access: Tip Sheet,” University of Texas, Nat’l Deaf Center on Post-Secondary Outcomes.)¹

The services at issue in this memo are “real-time captioning” and “closed captions.”

Disabled Student Programs and Services (“DSPS”) Students and the Academic Accommodation Plans (“AAP”)

Colleges offer academic adjustments, auxiliary aids, services and/or instruction through the DSPS program. (5 Cal. Code Regs. §§56000; 56026). Each college shall generate an AAP documenting the accommodations each student needs in his/her educational process. (5 Cal. Code Regs., §56022). Real-time captioning and closed captions, as defined above, are considered an appropriate auxiliary aid to ensure equitable access to instruction in this context.

Updated Guidance to Prioritize DSPS Students, Documented in the AAP

Due to the drastic increase in demand for captioning, the likely continuation of the need, and the limited state-level budget available to support these services, the Chancellor’s Office has established a tiered prioritization for state-level captioning requests, ensuring a focus on accommodating students with documented AAPs that require captioning services.

Effective November 1, 2020, each request for captions shall be accompanied by the requester’s certification that the request is for a student with an approved accommodation, as documented in his/her AAP. Colleges shall ensure all students needing accommodations are documented in their AAPs in order to comply with regulatory requirements and maximize state level financial resources. The priorities of incoming captioning requests are listed below:

1. All real-time captioning requests for classes and all closed caption requests for videos greater than thirty minutes in duration, if meeting the requirements described above, will be processed as requested.
2. All closed caption requests for videos less than thirty minutes in duration, if meeting the requirements described above, will be processed as auto-caption videos. Relevant faculty/staff should edit them for accuracy as needed.

¹ Available at <https://www.nationaldeafcenter.org/resource/why-captions-provide-equal-access>, last visited Oct. 18, 2020.

3. All closed caption requests for videos that do not have a certification of current need for accommodation but would like to be accessible for potential future students with disabilities will be processed as lowest priority auto-caption videos. Relevant faculty/staff should edit them for accuracy as needed.
4. All other captioning requests will be the sole responsibility of colleges to fund directly through college-level resources.

Logistical Details Regarding Real-time Captioning and Closed Caption Support Requests

The Chancellor's Office provides resources for both services through two sources: 1) the DECT Grant, hosted by College of the Canyons, for both services; and 2) CCC TechConnect (formerly 3C Media Solutions), an approved DECT vendor hosted by Palomar College, for closed caption requests only.

Colleges may access the DECT Application and Agreement form at www.canyons.edu/captioning. The cost of captioning services provided by vendors on the pre-approved list are paid for directly through existing contracts. Colleges may also select a captioning vendor not on the pre-approved list to establish their own contract and receive reimbursement for those services. Captioning services provided through this method are available for both synchronous and asynchronous content; however, colleges conducting live, synchronous meetings must request services in advance to ensure captioners are available and scheduled. Please contact James Glapa-Grossklag at james.glapa-grossklag@canyons.edu for questions related to these services.

College faculty and staff can upload pre-recorded instructional videos for closed captions from either a free TechConnect account or from within a Canvas course shell. To learn more about these services or create an account visit the TechConnect Cloud website at www.ccctechconnect.org.

Leverage All Available Funding

The Chancellor's Office will continue to explore financial and technical solutions to optimize its support for captioning services to the colleges. However, the responsibility of complying with Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act, and other relevant accessibility provisions of state law fundamentally reside with each college.

Colleges may decide to exercise local control and support universal design by extending closed caption services to all videos regardless of length and/or expanding captioning services to all classes. In that case, colleges are encouraged to leverage all available funding to provide student-centered services that ensure students equitable access to education and advance Vision for Success goals. Additional funding sources under consideration may include categorical funding sources such as the DSPS Program and the Student Equity and Achievement Program, and other Federal and State funding.

If you have any questions regarding this Guidance Memorandum, please contact Linda Vann at lvann@cccco.edu or (916) 322-3234.

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